



U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Administration on Children, Youth and Families
Children's Bureau

FINAL REPORT

Colorado Child and Family Services Review

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**U.S. Department of Health and Human Services
Administration for Children and Families
Administration on Children, Youth and Families
Children's Bureau**

EXECUTIVE SUMMARY

Child and Family Services Review

COLORADO

The Child and Family Services Review (CFSR) assesses State performance during a specified time period with respect to seven child welfare outcomes in the areas of safety, permanency, and well-being and with respect to seven systemic factors. The assessment is based on information from the following sources:

- The Statewide Assessment prepared by the State child welfare agency – the Colorado Department of Human Services (DHS);
- The State Data Profile prepared by the Children’s Bureau of the U.S. Department of Health and Human Services;
- Reviews of 50 cases from three counties in the State conducted during an onsite review the week of June 17- 21, 2002; and
- Interviews or focus groups (conducted at all three counties and the State capital) with a wide range of stakeholders including children, parents, foster parents, various levels of State and local DHS personnel, collaborating agency personnel, school personnel, service providers, court personnel, legislators, and attorneys.

A key finding of the review of Colorado’s child welfare programs is that the State achieved substantial conformity with Child Well-Being Outcome 2—Children receive appropriate services to meet their educational needs. Ninety-one percent of the cases reviewed substantially achieved this outcome. The State also met the national standards for measures relating to repeat maltreatment, length of time to reunification, length of time to adoption, and stability of foster care placements. In addition, the following were rated to be areas of strength:

- Recurrence of maltreatment within 6 months of a substantiated or indicated maltreatment report (item 2).
- Providing services to families to protect children in their homes and prevent removal (item 3).
- Addressing the issue of risk of harm to children (item 4).
- Diligent efforts to attain the goals of reunification or permanent placement with relatives (item 8).
- Placing children in close proximity to their biological families (item 11) and with their siblings (item 12) when possible and in the children's best interest.
- Diligent efforts to locate and assess relatives as potential placement resources (item 15).

Colorado did not achieve substantial conformity with six of the seven safety, permanency, and well-being outcomes. The State also did not meet national standards for maltreatment of children in foster care and foster care re-entries. The most significant concern with regard to outcomes is the State’s inconsistency in achieving permanency for children in foster care. Stakeholders and reviewers noted that while the State has made gains in expediting permanency for children under age 6 through the Expedited Permanency Planning initiative, the same attention is not given to attaining permanency for older children in foster care. Permanency Outcome 1—Children have permanency and stability in their living situations—was found to be substantially achieved in only 52 percent of the foster care cases reviewed. Within this outcome, although the State’s data met the national standard for length of time to adoption, reviewers determined that only one of six adoption cases (17 percent) reviewed onsite was proceeding to finalization in a timely manner. In

the other five adoption cases, there were delays in achieving adoption, some of which were related to casework practices, rather than systemic barriers. Other items that were rated as Area Needing Improvement for this outcome were foster care re-entries (item 5), stability of foster care placement (item 6), permanency goal (item 7), and other planned permanent living arrangement (item 10).

Another area of concern related to Child and Family Well-Being Outcome 1—Families have enhanced capacity to provide for their children’s needs. During the case review 60 percent of the cases were found to have substantially achieved this outcome, which included assessments of whether children and families received needed services (item 17) or were involved in case planning (item 18), and the frequency of caseworker visits with children and parents (items 19 and 20). The State also did not achieve substantial conformity with Child and Family Well-Being Outcome 3—Children receive adequate services to meet their physical and mental health needs—with 61 percent of the cases reported to have substantially achieved that outcome.

With regard to performance on the systemic factors, the CFSR determined that the State was in substantial conformity with factors related to the Statewide information system; quality assurance; training for child welfare staff and child caregivers; the array of services available to families; agency responsiveness to the community; and foster and adoptive parent licensing, recruitment, and retention. However, the State was not in substantial conformity with the factor pertaining to the case review system. A key concern related to the State’s case review system was the finding that many parents are not involved in the case planning process, particularly fathers. Other key concerns relate to the timeliness of hearings for children in foster care, and the fact that the court does not have jurisdiction, by State law, to conduct permanency hearings for children in foster care following a commitment to the Division of Youth Corrections (DYC).

The following is a summary of the CFSR findings regarding specific outcomes and systemic factors.

KEY FINDINGS RELATED TO OUTCOMES

I. SAFETY

Outcome S1: Children are, first and foremost, protected from abuse and neglect.

Status of Safety Outcome S1 – Not in Substantial Conformity

Colorado did not achieve substantial conformity with Safety Outcome 1. Although reviewers determined that this outcome had been substantially achieved in 89.5 percent of the cases, the State did not meet the national standard for maltreatment of children in foster care.

A general CFSR finding was that there is a low incidence of repeat maltreatment in Colorado. However, some concerns were identified in the area of responding to maltreatment reports in a timely manner. The key issue was that face-to-face contact is not always established in a timely manner, and that agency policy does not require face-to-face contact as part of initiating an investigation. In addition, the State did not meet the national standard with respect to

maltreatment of children in foster care. Stakeholders commenting on this issue suggested that the incidence of maltreatment in foster care may be attributed to the improper use of physical restraints in institutions. A summary of the findings for specific items assessed under this outcome is presented below.

Item 1. Timeliness of initiating investigations of reports of child maltreatment

Item 1 was assigned an overall rating of Area Needing Improvement. In 69 percent of the applicable cases reviewers found that the agency had initiated investigations of reports of child maltreatment in a timely manner, but there were concerns related to this issue in 31 percent of the applicable cases reviewed.

Item 2. Repeat maltreatment

Item 2 was assigned an overall rating of Strength for the following reasons:

- The incidence of repeat maltreatment reported in the State Data Profile was 2.7 percent, which meets the national standard of 6.1 percent.
- There was no repeat maltreatment in any of the 38 applicable cases.

Most stakeholders expressed the opinion that maltreatment recurrence currently is not a problem in Colorado because of the availability of services and supports for families.

Outcome S2: Children are safely maintained in their homes whenever possible and appropriate.

Status of Safety Outcome S2 – Not in Substantial Conformity

Colorado did not achieve substantial conformity with Safety Outcome 2. This determination was based on the finding that the outcome was substantially achieved in 82 percent of the cases reviewed, which is less than the 90 percent required for a rating of substantial conformity.

A general CFSR finding was that for the most part, DHS made concerted efforts to maintain children safely in their homes and was effective in managing the risk of harm to children. Both of the indicators for this outcome were rated as Strengths. However, there was not a sufficient number of cases in which both items were rated as a Strength to attain the 90 percent requirement. A summary of the findings for specific items assessed under this outcome is presented below.

Item 3. Services to family to protect child(ren) in home and prevent removal

Item 3 was assigned an overall rating of Strength because in 91 percent of the cases, reviewers determined that the agency had made diligent efforts to maintain children safely in their homes. The Statewide Assessment notes that the agency's core services and services offered through the Promoting Safe and Stable Families (PSSF) Program provide a range of services to prevent children's placement in out-of-home care.

Item 4. Risk of harm to child

Item 4 was assigned an overall rating of Strength because reviewers determined that in 87 percent of the cases, DHS made sufficient efforts to reduce risk of harm to children. Many stakeholders commenting on this issue suggested that the agency is very competent in managing

the risk of harm to children and noted that safety is a primary agency concern. Stakeholders also expressed the opinion that children are appropriately removed from their homes when necessary. A key concern, however, was that parents may not be receiving sufficient services after their children are removed to promote safe reunification.

II. PERMANENCY

Outcome P1: Children have permanency and stability in their living situations.

Status of Permanency Outcome 1 – Not in Substantial Conformity

Colorado did not achieve substantial conformity with Permanency Outcome 1. This determination was based on the following:

- Although the State met the national standards for length of time to reunification and adoption and stability of foster care placements, the State did not meet the national standard for foster care re-entries.
- 52 percent of the cases reviewed were rated as having substantially achieved Permanency Outcome 1, which is less than the 90 percent required for substantial conformity.

In 86 percent of the cases reviewed, reviewers determined that the agency had made, or was making, diligent efforts to attain the goals of reunification or permanent placement with relatives. However, a general CFSR finding was that DHS was not consistently effective in establishing appropriate permanency goals or achieving the permanency goal of adoption in a timely manner. Another key concern pertained to the use of the goal of long-term foster care leading to emancipation. Reviewers determined that for many of the cases with this goal, DHS had not made sufficient efforts to explore other permanency options such as adoption or guardianship before establishing the goal. A summary of findings for specific items assessed under this outcome is presented below.

Item 5. Foster care re-entries

Item 5 was assigned an overall rating of Area Needing Improvement. In 82 percent of applicable cases, reviewers determined that there were no re-entries into foster care within 12 months of discharge from a prior foster care episode. However, there were re-entries within 12 months of discharge from a prior foster care episode in 18 percent of the applicable cases. In addition, data from the State Data Profile indicate that the State's rate of re-entry into foster care within 12 months is 19.3 percent, which does not meet the national standard of 8.6 percent.

Item 6. Stability of foster care placement

Item 6 was assigned an overall rating of Area Needing Improvement. In 79 percent of applicable cases reviewers determined that children had placement stability and/or that placement changes were in the child's best interest. However, reviewers determined that in 21 percent of cases children did not have stability in their foster care placements. A key concern was lack of efforts to address the needs of foster parents experiencing problems with children in their care.

Item 7. Permanency goal for child

Item 7 was assigned an overall rating of Area Needing Improvement. In 72 percent of foster care cases, reviewers determined that DHS had established appropriate permanency goals for children in a timely manner. However, concerns were identified regarding this issue in 28 percent of foster care cases. The major concerns identified were delays in changing a child's goal to adoption, a lack of concurrent planning efforts in at least one of the counties included in the onsite review, and a lack of consideration of the permanency goals of adoption or guardianship before establishing a goal of long-term foster care/emancipation.

Item 8. Reunification, Guardianship or Permanent Placement with Relatives

This item was assigned an overall rating of Strength based on the following:

- The State Data Profile indicates that the State's percentage of reunifications occurring within 12 months of entry into foster care (85.7%) meets the national standard of 76.2 percent.
- In 86 percent of the applicable cases, reviewers determined that the agency had made, or was making, diligent efforts to attain the goals of reunification or permanent placement with relatives.

Item 9. Adoption

Item 9 was assigned an overall rating of Area Needing Improvement. In 17 percent of the applicable cases, reviewers determined that DHS made diligent efforts to achieve finalized adoptions in a timely manner. However reviewers identified unnecessary delays in attaining finalized adoptions in 83 percent of applicable cases. A key concern was that these delays were due to casework practices rather than to court-related or system-imposed barriers.

Item 10. Permanency goal of other planned permanent living arrangement

Item 10 was assigned an overall rating of Area Needing Improvement. In 56 percent of the applicable cases, reviewers determined that the agency had made diligent efforts to assist children in attaining the goal of emancipation. There were concerns related to this issue in 44 percent of applicable cases, primarily because reviewers determined that the children were not being adequately prepared for independent living.

Outcome P2: The continuity of family relationships and connections is preserved for children.

Status of Permanency Outcome 2 – Not in Substantial Conformity

Colorado did not achieve substantial conformity with Permanency Outcome 2. This determination was based on the finding that the outcome was rated as substantially achieved in 79.3 percent of the cases, which is less than the 90 percent required for substantial conformity. Although the State was not in substantial conformity for this outcome, there were areas of strength with respect to the agency's efforts to preserve the continuity of family relationships and connections for children. A key concern was inconsistency in agency efforts to promote visitation or bonding with fathers, as reflected in the ratings for items 13, 14, and 16. A summary of findings for specific items assessed relevant to this outcome is presented below.

Item 11. Proximity of foster care placement

Item 11 was assigned an overall rating of Strength because in 93 percent of the applicable cases, reviewers determined that children had been placed in foster care homes that were in close proximity to their parents or, when children were placed far away from parents, the placement was necessary to meet the children's special needs. This finding is consistent with information in the Statewide Assessment indicating that DHS makes every effort to comply with the Federal requirement that a child must be placed as close to home as possible.

Item 12. Placement with siblings

Item 12 was assigned an overall rating of Strength based on the finding that, in 94 percent of the applicable cases, siblings were either placed together or there was a justifiable reason for their separation. Colorado enacted legislation in 2000 to ensure the placement of siblings in the same foster home.

Item 13. Visiting with parents and siblings in foster care

Item 13 was assigned an overall rating of Area Needing Improvement. In 81 percent of the applicable cases, reviewers determined that DHS had made, or was making, concerted efforts to facilitate visitation. However, there were concerns related to this issue in 19 percent of applicable cases. A key concern was the inconsistency of DHS' efforts to promote visitation between children and their fathers.

Item 14. Preserving connections

Item 14 was assigned an overall rating of Area Needing Improvement. In 72 percent of the foster care cases, reviewers determined that DHS made diligent efforts to preserve children's connections. However, there were concerns related to this issue in 28 percent of cases. In these cases, reviewers found that DHS had not made efforts to preserve children's connections to extended family, former foster parents, ethnic heritage, biological family, church, and/or friends.

Item 15. Relative placement

Item 15 was assigned an overall rating of Strength, because reviewers determined that the agency made diligent efforts to locate and assess relatives as potential placement resources in 88 percent of the cases. These efforts are facilitated by Colorado legislation requiring courts to order parents to identify relatives to be considered for placement. This usually occurs at the time of the temporary custody hearing.

Item 16. Relationship of child in care with parents

Item 16 was assigned an overall rating of Area Needing Improvement. In 80 percent of the applicable cases, reviewers determined that DHS made efforts to support the parent-child relationship of children in foster care. However, concerns related to this issue were identified in 20 percent of applicable cases. A key concern for these cases was a lack of agency effort to promote children's relationship with their fathers.

III. WELL-BEING

Outcome WB1: Families have enhanced capacity to provide for their children's needs.

Status of Well-Being Outcome 1 – Not in Substantial Conformity

Colorado did not achieve substantial conformity with Well-Being Outcome 1. This determination was based on the finding that the outcome was rated as substantially achieved in 60 percent of the cases reviewed, which is less than the 90 percent required for a determination of substantial conformity. A summary of findings for specific items assessed as relevant to this outcome is presented below.

Item 17. Needs and services of child, parents, foster parents

Item 17 was assigned an overall rating of Area Needing Improvement. In 64 percent of the cases, reviewers determined that the needs and services of children, parents, and/or foster parents had been, or were being, adequately addressed by DHS. However, there were concerns related to this issue in 36 percent of cases. A key concern was that, although the children received services, they still had critical service needs that were not being addressed by the agency. Reviewers determined that the unmet service needs were due to needs assessments that were not sufficiently comprehensive to identify underlying problems.

Item 18. Child and family involvement in case planning

Item 18 was assigned an overall rating of Area Needing Improvement. In 72 percent of the applicable case records, reviewers determined that DHS appropriately involved parents or children in the case planning process. However, concerns related to this issue were identified in 28 percent of the cases. The key concern noted was that children and fathers were not being involved in the process.

Item 19. Worker visits with child

Item 19 was assigned an overall rating of Area Needing Improvement. In 76 percent of the cases, reviewers determined that the frequency of caseworker visits with children was sufficient to ensure adequate monitoring of their safety or otherwise meet their needs. There were concerns related to this issue in 24 percent of cases. Reviewers found that caseworkers did not visit children with sufficient frequency to meet their needs (20 percent), and/or caseworker visits did not focus on issues relevant to the case plan or achieving the child's permanency goal (16 percent).

Item 20. Worker visits with parents

This item was assigned an overall rating of Area Needing Improvement. In 67 percent of the cases, reviewers determined that visits with parents were sufficiently frequent or of sufficient quality to promote the safety and well-being of the child or enhance attainment of case goals. Reviewers identified concerns related to this issue in 33 percent of cases, because visits were not sufficiently frequent to meet the needs of parents and children (22 percent), and/or visits did not focus on substantive issues pertaining to the case (17 percent).

Outcome WB2: Children receive appropriate services to meet their educational needs.

Status of Well-Being Outcome WB2 – Substantial Conformity

Colorado achieved substantial conformity with Well-Being Outcome 2. This determination is based on the finding that 91 percent of the cases reviewed were found to

have substantially achieved this outcome, which meets the requirement for substantial conformity. A summary of findings for the specific item assessed for this outcome is presented below.

Item 21. Educational needs of the child.

Item 21 was assigned an overall rating of Strength because for 91 percent of the cases, reviewers determined that DHS was effective in meeting children's educational needs. Stakeholders commenting on this issue expressed the opinion that DHS is effective in ensuring that children's educational needs are addressed, and that accomplishing this requires a great deal of advocacy with the schools on the part of caseworkers and foster parents.

Outcome WB3: Children receive adequate services to meet their physical and mental health needs.

Status Of Well-Being Outcome 3 - Not in Substantial Conformity

Colorado did not achieve substantial conformity with Well-Being Outcome 3. The outcome was rated as substantially achieved in 61 percent of the applicable cases, which is less than the 90 percent required for a determination of substantial conformity.

A general finding of the CFSR was that DHS is inconsistent in its efforts to address children's physical and mental health needs. For example, case reviewers determined that many children did not receive either routine preventive dental services or needed dental services. Stakeholders suggested that this problem might be due in part to delays in providing Medicaid cards and the lack of providers who will accept Medicaid payments. Reviewers also found that children's mental health needs were not being adequately assessed; when mental health services were recommended, DHS did not always follow up to ensure that children received these services. A summary of findings for the specific items assessed for this outcome is presented below.

Item 22. Physical health of the child

Item 22 was assigned an overall rating of Area Needing Improvement. In 77 percent of the applicable cases, reviewers determined that DHS adequately addressed children's health needs. However, reviewers determined that these needs were not adequately met in 23 percent of applicable cases. A key concern noted in these cases was that children did not receive a comprehensive health assessment at entry into foster care.

Item 23. Mental health of the child

Item 23 was assigned an overall rating of Area Needing Improvement. In 72 percent of the applicable cases, reviewers determined that DHS adequately addressed children's mental health needs. However, in 28 percent of the applicable cases, reviewers determined that mental health needs were not met. Stakeholders commenting on this issue expressed the opinion that DHS has not been consistently effective in addressing the mental health needs of children, either through assessment or services.

KEY FINDINGS RELATING TO SYSTEMIC FACTORS

IV. STATEWIDE INFORMATION SYSTEM

Status of Statewide Information System – Substantial Conformity

Colorado is in substantial conformity with this factor.

Item 24. The State is operating a Statewide information system that, at a minimum, can readily identify the status, demographic characteristics, location, and goals for the placement of every child who is (or within the immediately preceding 12 months, has been) in foster care.

Item 24 was rated as a Strength because the State has the automated capacity to track the required information on children in foster care, such as the status, demographic characteristics, location, and goals.

V. CASE REVIEW SYSTEM

Status of Case Review System – Not in Substantial Conformity

Colorado is not in substantial conformity with the factor of Case Review System.

Item 25. Provides a process that ensures that each child has a written case plan to be developed jointly with the child's parent(s) that includes the required provisions.

Item 25 was rated as an Area Needing Improvement. Although the State has requirements for developing case plans jointly with parents, the results of the onsite review and the survey of parents conducted by the Administrative Review Division (ARD) indicate that many parents are not involved in the case planning process, particularly fathers.

Item 26. Provides a process for the periodic review of the status of each child, no less frequently than once every 6 months, either by a court or by administrative review.

Item 26 was rated as a Strength because the Department's ARD has a well-developed and structured process for ensuring that periodic reviews of children in foster care are conducted in a timely manner.

Item 27. Provides a process that ensures that each child in foster care under the supervision of the State has a permanency hearing in a qualified court or administrative body no later than 12 months from the date the child entered foster care and no less frequently than every 12 months thereafter.

Item 27 was rated as an Area Needing Improvement because of concerns about the timeliness of conducting permanency hearings for children in foster care and concerns that the court does not conduct permanency hearings for children committed to the Department of Youth Corrections (DYC) who remain in foster care. Stakeholders commenting on this issue were in general agreement that the 12-month permanency hearings are not being held in a timely manner.

Item 28. Provides a process for termination of parental rights proceedings in accordance with the provisions of the Adoption and Safe Families Act.

Item 28 was rated as an Area Needing Improvement. While the State has made notable gains in expediting permanency for children under age 6 through the Expedited Permanency Planning initiative, the onsite review did not find evidence that the same attention is given to termination of parental rights (TPR) for older children. The agency's attention to TPR is based on the age of the child, rather than the child's status or case circumstances.

Item 29. Provides a process for foster parents, pre-adoptive parents, and relative caregivers of children in foster care to be notified of, and have an opportunity to be heard in, any review or hearing held with respect to the child.

Item 29 is rated as a Strength because there are provisions in place to notify foster parents, pre-adoptive parents, and related caregivers of hearings and reviews. The State's major strength in meeting this requirement is in providing notification of periodic reviews conducted by the ARD. However, although there are provisions in place to provide notification of court hearings, these are not implemented consistently.

VI. QUALITY ASSURANCE SYSTEM

Status of Quality Assurance System-Substantial Conformity

Colorado is in substantial conformity with the factor of Quality Assurance System. Findings relevant to the specific items assessed for this factor are presented below.

Item 30. The State has developed and implemented standards to ensure that children in foster care are provided quality services that protect the safety and health of the children.

Item 30 was rated as a Strength because the State has standards in place that appropriately address the safety and health of children in foster care. Stakeholders commenting on this issue noted that the standards established by the State are comprehensive and relevant.

Item 31. The State is operating an identifiable quality assurance system that is in place in the jurisdictions where the services included in the CFSP are provided, evaluates the quality of services, identifies strengths and needs of the service delivery system, provides relevant reports, and evaluates program improvement measures implemented.

Item 31 was rated as a Strength because DHS operates a comprehensive quality assurance system that 1) establishes desired outcomes and indicators for tracking performance, 2) produces performance data from case reviews and stakeholder surveys, and 3) uses the performance data for quality improvement processes.

VII. TRAINING

Status of Training-Substantial Conformity

Colorado is in substantial conformity with the systemic factor of Training. Findings relevant to the specific items assessed for this factor are presented below.

Item 32. The State is operating a staff development and training program that supports the goals and objectives in the CFSP, addresses services provided under titles IV-B and IV-E, and provides initial training for all staff who deliver these services.

Item 32 was assigned an overall rating of Strength because the State has a pre-service staff training program in place that addresses the skills and information needed for staff to perform their jobs. Most stakeholders commenting on this issue praised the training for new caseworkers and new supervisors.

Item 33. The State provides for ongoing training for staff that addresses the skills and knowledge base needed to carry out their duties with regard to the services included in the CFSP.

Item 33 was rated as a Strength because the State requires and supports ongoing staff training. For the most part, stakeholders indicated that DHS makes concerted efforts to provide training opportunities that will help staff build knowledge and skills.

Item 34. The State provides training for current or prospective foster parents, adoptive parents, and staff of State licensed or approved facilities that care for children receiving foster care or adoption assistance under title IV-E that addresses the skills and knowledge base needed to carry out their duties with regard to foster and adopted children.

Item 34 is rated as an area needing improvement because of the issues concerning access to pre-service and ongoing training by foster parents.

VIII. SERVICE ARRAY

Status of Service Array-Substantial Conformity

Colorado is in substantial conformity with the factor of Service Array. Findings relevant to the specific items assessed for this factor are presented below.

Item 35. The State has in place an array of services that assess the strengths and needs of children and families and determine other service needs, address the needs of families in addition to individual children in order to create a safe home environment, enable children to remain safely with their parents when reasonable, and help children in foster and adoptive placements achieve permanency.

Item 35 is rated as a Strength because the State has the necessary array of services in place to meet the needs of children and families. According to the Statewide Assessment, DHS has mandated a statewide set of core services. In addition to the core services program, Colorado's Promoting Safe and Stable Families (PSSF) Program is active in 34 counties and the Ute Mountain Ute Indian Reservation.

Item 36. The services in item 35 are accessible to families and children in all political jurisdictions covered in the State's CFSP.

Item 36 was rated as an Area Needing Improvement because some services are not available in all of the rural areas. Families have to travel long distances in rural areas to access services.

Item 37. The services in item 35 can be individualized to meet the unique needs of children and families served by the agency.

Item 37 is rated as a Strength because the agency has the capacity to individualize services to children and families, although in some areas gaps in the service array affect this capacity to some extent.

IX. AGENCY RESPONSIVENESS TO THE COMMUNITY

Status of Agency Responsiveness To The Community- Substantial Conformity

Colorado is in substantial conformity with the factor of Agency Responsiveness to the Community. Findings relevant to the specific items assessed for this outcome are presented below.

Item 38. In implementing the provisions of the CFSP, the State engages in ongoing consultation with tribal representatives, consumers, service providers, foster care providers, the juvenile court, and other public and private child- and family-serving agencies and includes the major concerns of these representatives in the goals and objectives of the CFSP.

Item 38 was rated as a Strength because the agency engages in extensive efforts to collaborate with other agencies and organizations, both locally and at the State level. According to the Statewide Assessment, Colorado's planning for the 2000-2004 CFSP included an extensive community consultation process to ensure the participation of a broad spectrum of public and private agencies, community-based organizations, parents and youth who have had past or present involvement with the child welfare system, as well as representation from culturally diverse populations.

Item 39. The agency develops, in consultation with these representatives, annual reports of progress and services delivered.

Item 39 is rated as a Strength because DHS consults with stakeholders on developing the IV-B plan.

Item 40. The State's services under the CFSP are coordinated with services or benefits of other Federal or federally assisted programs serving the same population.

Item 40 is rated as a Strength because DHS is effective in its efforts to coordinate services with other agencies and organizations. Colorado has used Child Abuse Prevention and Treatment Act (CAPTA) funds to promote coordination across systems and has sponsored training and projects that involve the participation of providers from various agencies.

X. FOSTER AND ADOPTIVE PARENT LICENSING, RECRUITMENT, AND RETENTION

Status of Foster and Adoptive Parent Licensing, Recruitment, and Retention-Substantial Conformity

Colorado is in substantial conformity with the factor of Foster and Adoptive Parent Licensing, Recruitment, and Retention. Findings relevant to the specific items assessed for this outcome are presented below.

Item 41. The State has implemented standards for foster family homes and childcare institutions, which are reasonably in accord with recommended national standards.

Item 41 is rated as a Strength because the State has implemented the necessary standards for foster family homes and child care institutions.

Item 42. The standards are applied to all licensed or approved foster family homes or child care institutions receiving title IV-E or IV-B funds.

Item 42 is rated as an Area Needing Improvement. Although the State has the same standards for both related and non-related foster homes, it may waive the non-safety related standards for both related and non-related homes, while Federal policy only allows waivers of non-safety related requirements for related homes.

Item 43. The State complies with Federal requirements for criminal background clearances as related to licensing or approving foster care and adoptive placements and has in place a case planning process that includes provisions for addressing the safety of foster care and adoptive placements for children.

Item 43 was rated as a Strength because the State complies with all Federal requirements for criminal background clearances. In 2001, Colorado passed legislation adopting language to assure full compliance with ASFA requirements for criminal records checks on foster and adoptive families. According to stakeholders, criminal background checks are completed for all foster parents.

Item 44. The State has in place a process for ensuring the diligent recruitment of potential foster and adoptive families that reflect the ethnic and racial diversity of children in the State for whom foster and adoptive homes are needed.

Item 44 is rated as a Strength because there are a lot of ongoing efforts to recruit potential foster and adoptive families, some of which focus on recruitment of African American, Hispanic and Native American foster and adoptive parents.

Item 45. The State has in place a process for the effective use of cross-jurisdictional resources to facilitate timely adoptive or permanent placements for waiting children.

Item 45 is rated as a Strength because the State has made concerted efforts to place children across jurisdictional boundaries, when appropriate. Stakeholders commenting on this issue reported that DHS actively participates in the Adoption Exchange and that it is not uncommon for Colorado children to be adopted across State lines.

INTRODUCTION

This document presents the findings of the Child and Family Services Review (CFSR) for the State of Colorado. The findings were derived from the following documents and data collection procedures:

- The Statewide Assessment prepared by the State child welfare agency – the Colorado Department of Human Services (DHS);
- The State Data Profile prepared by the Children’s Bureau of the U.S. Department of Health and Human Services;
- Reviews of 50 case records at three sites throughout the State conducted during an onsite review in the State during the week of June 17-21, 2002; and
- Interviews or focus groups (conducted at all three sites) with State and local stakeholders including children, parents, foster parents, all levels of child welfare agency personnel, collaborating agency personnel, school personnel, service providers, court personnel, legislators, and attorneys.

The key characteristics of the 50 cases reviewed are the following:

- 24 cases were reviewed in Denver County, 14 in El Paso County, and 12 in Morgan County.
- All 50 cases had been open cases at some time during the period under review.
- 29 of the cases were “foster care cases” (cases in which children were in the custody of the State child welfare agency and in an out-of-home placement at some time during the period under review), and 21 were “in-home services cases” (cases in which families received services from the child welfare agency while children remained in their homes).
- 7 of the 29 foster care cases and 1 of the in-home cases were juvenile justice cases.
- In 14 cases, all children in the family were Caucasian; in 7 cases, all children in the family were African American; in 17 cases, all children in the family were Hispanic; in 2 cases, all children in the family were Asian; and in 8 cases, the children were two or more races. In 2 cases, reviewers did not identify the race/ethnicity of the children.
- Of the 50 case records reviewed, the **primary** reasons for opening the child welfare agency case were the following:
 - Child’s behavior – 12 cases (24%)
 - Physical abuse – 10 cases (20%)
 - Neglect (not including medical neglect) – 9 cases (18%)
 - Substance abuse by parent – 5 cases (10%)
 - Child in juvenile justice system – 4 cases (8%)
 - Mental/physical health of parent – 3 cases (6%)
 - Sexual abuse – 3 cases (6%) [In one case the child was the perpetrator.]
 - Abandonment – 1 case (2%)
 - Domestic violence in child’s home – 1 case (2%)
 - Other – 2 cases (4%)

- Among **all** reasons identified for children coming to the attention of the child welfare agency, child's behavior was cited in 26 (52%) cases, neglect (not including medical neglect) was cited in 17 (34%) cases, physical abuse was cited in 16 (32%) cases, mental/physical health of the parent was cited in 14 (28%) cases, substance abuse by parents was cited in 12 (24%) cases, and domestic violence in the child's home was cited in 10 (20%) cases.
- For 13 of the 29 foster care cases, the children entered foster care prior to the period under review and remained in foster care during the entire period under review; for 11 of the 21 in-home services cases, the case was opened prior to the period under review.

The first section of the report presents the CFSR findings relevant to the State's performance in achieving specific outcomes for children in the areas of safety, permanency, and well-being. For each outcome, there is a table presenting key findings, a discussion of the State's status with regard to the outcome, and a presentation and discussion of each item (indicator) assessed for the outcome. The second section of the report provides a rating and a discussion for each systemic factor relevant to the child welfare agency's ability to achieve positive outcomes for children.

SECTION 1: OUTCOMES

I. SAFETY

Safety Outcome 1

Outcome S1: Children are, first and foremost, protected from abuse and neglect.					
Number of cases reviewed by the team according to degree of outcome achievement:					
	Denver	El Paso	Morgan	Total Number	Total Percentage
Substantially Achieved:	20	8	6	34	89.5
Partially Achieved:	1	1	2	4	10.5
Not Achieved or Addressed:	0	0	0	0	0.0
Not Applicable:	3	5	4	12	
Conformity of Statewide data indicators with national standards:					
	National Standard (percentage)	State's Percentage	Meets Standard	Does Not Meet Standard	
Repeat maltreatment	6.1	2.7	X		
Maltreatment of children in foster care	0.57	.73		X	

STATUS OF SAFETY OUTCOME 1

Colorado did not achieve substantial conformity for Safety Outcome 1. This determination was based on the finding that the State did not meet the national standard for maltreatment of children in foster care by foster parents or facility staff.

A general CFSR finding was that there is a low incidence of repeat maltreatment in Colorado. Data from the State Data Profile indicate that Colorado's incidence of maltreatment recurrence (2.7%) meets the national standard (6.1%) for the percentage of children experiencing more than one substantiated or indicated child maltreatment report within a 6-month period. In addition, the item pertaining to repeat maltreatment was rated as a Strength in all of the applicable cases reviewed during the onsite review. Information

from stakeholder interviews and the Statewide Assessment suggest that the low incidence of repeat maltreatment may be an indication of the success of the services and specialized interventions that are available to children and families in the State.

The State, however, did not meet the national standard with respect to maltreatment of children in foster care. Stakeholders commenting on this issue suggested that the incidence of maltreatment in foster care may be attributed to the improper use of physical restraints in institutions. Because there are more delinquents entering out-of-home care, the use of restraints may be a more frequent occurrence. One stakeholder noted that children with behavioral problems sometimes are being placed with families rather than in group homes or institutions, and maltreatment may occur because the family is unable to cope with the children's behaviors.

The findings pertaining to the specific items assessed under Safety Outcome 1 are presented below.

Item 1: Timeliness of initiating investigations of reports of child maltreatment

_____ Strength X Area Needing Improvement

Review Findings: The assessment of item 1 was applicable for 13 of the 50 cases. Thirty-seven cases were not applicable because they did not involve reports of child maltreatment during the period under review. In assessing item 1, reviewers were to determine whether the response to a maltreatment report occurring during the period under review had been initiated in accordance with child welfare agency policy. In Colorado, reports are designated as high risk, moderate to low risk, and low risk. Policy requires that for high risk reports, the investigation must be initiated within 24 hours of receipt of the report; for moderate to low-risk reports, the investigation must be initiated no later than 72 hours after receipt of the report; and for low risk referrals, the investigation must be initiated no later than 4 working days following receipt of the report. State policy does not proscribe timeframes for face-to-face contact. The results of the assessment were the following:

- Item 1 was rated as a Strength in 9 (69%) of the 13 applicable cases (7 of which were foster care cases).
- Item 1 was rated as an Area Needing Improvement in 4 (31%) of the 13 applicable cases (1 of which was a foster care case).

This item was rated as a Strength in all cases in which the initiation of an investigation of a child maltreatment report occurring during the period under review was in accordance with agency guidelines or policy for the priority level assigned to the report. For the four cases rated as Area Needing Improvement for this item, reviewers noted that the agency did not respond to one or more reports of child maltreatment in accordance with the timeframes established by policy. These four cases involved five reports of maltreatment. Two reports were low risk, one was moderate to low risk, and two were high risk.

Most stakeholders commenting on this issue expressed the opinion that DHS responds to reports of child maltreatment in a timely manner. However, a few stakeholders indicated that face-to-face contact does not always occur in a timely manner, and expressed concerns about the fact that agency policy does not require face-to-face contact as a criteria for initiating an investigation.

Determination and Discussion: Item 1 was assigned an overall rating of Area Needing Improvement based on the finding that in 31 percent of the applicable cases, the agency did not respond to a maltreatment report in a timely manner.

Item 2. Repeat maltreatment

 X Strength Area Needing Improvement

Review Findings: The assessment of item 2 was applicable for 38 of the 50 cases. In assessing this item, reviewers were to determine whether there had been at least one substantiated or indicated maltreatment report during the period under review, and if so, whether another substantiated or indicated report occurred within 6 months of that report. The results of the assessment were that the item was rated as Strength in all 38 (100%) applicable cases (22 of which were foster care cases).

An additional finding with respect to repeat maltreatment was that there were multiple maltreatment reports over the life of the case for the majority of the cases reviewed. Of the 38 applicable cases, 30 had 3 or more reports over the life of the case, although not all reports were substantiated or indicated. Ten cases had 10 or more reports over the life of the case. Seven of these ten cases were foster care cases and three were in-home services cases.

Most stakeholders commenting on this issue expressed the opinion that maltreatment recurrence is not a problem in the State because of the availability of services and supports for families. However, a few stakeholders expressed concern about the number of reports that are “screened out” – i.e., not assigned for an investigation.

Determination and Discussion: Item 2 was assigned an overall rating of Strength based on the following:

- There was no recurrence of maltreatment in 100 percent of the cases.
- Data from the State Data Profile indicate that the State's incidence of repeat maltreatment was 2.7 percent, which meets the national standard of 6.1 percent.

According to the Statewide Assessment, the low incidence of maltreatment recurrence is a significant indicator of the success of services and specialized interventions.

Safety Outcome 2

Safety Outcome S2: Children are safely maintained in their homes whenever possible and appropriate.					
Number of cases reviewed by the team according to degree of outcome achievement:					
	Denver	El Paso	Morgan	Total Number	Total Percentage
Substantially Achieved:	15	9	8	32	82.0
Partially Achieved:	4	0	0	4	10.3
Not Achieved or Addressed:	2	1	0	3	7.7
Not Applicable:	3	4	4	11	

STATUS OF SAFETY OUTCOME 2

Colorado did not achieve substantial conformity with Safety Outcome 2. This determination was based on the finding that the outcome was substantially achieved in 82 percent of the cases reviewed, which is less than the 90 percent required for a rating of substantial conformity.

A general CFSR finding was that for the most part, DHS made concerted efforts to maintain children safely in their homes and was effective in managing the risk of harm to children. Both of these indicators were rated as a Strength for the agency. However, there were not a sufficient number of cases in which both were rated as a Strength to attain the 90 percent substantially achieved requirement.

Findings pertaining to the specific items assessed under Safety Outcome 2 are presented and discussed below.

Item 3. Services to family to protect child(ren) in home and prevent removal

☒ Strength ☐ Area Needing Improvement

Review Findings: There were 23 cases for which an assessment of item 3 was applicable. Twenty-seven cases were excluded from this assessment because there were no substantiated maltreatment reports or identified risks of harm to children in the home during the period under review. For this item, reviewers were to assess whether, in responding to a substantiated or indicated maltreatment report or risk of harm, the agency made diligent efforts to provide services to families to prevent removal of children from their homes while at the same time ensuring their safety. The results of this assessment were the following:

- Item 3 was rated as a Strength in 21 (91%) of the 23 applicable cases (6 of which were foster care cases).
- Item 3 was rated as an Area Needing Improvement in 2 (9%) of the 23 applicable cases (all of which were foster care cases).

This item was rated as a Strength when reviewers determined that DHS assessed the family's service needs appropriately and provided or referred the family for services to meet those needs. Families received a variety of services including (but not limited to) parenting instruction/classes, in-home services, household management services, counseling, lice treatment, prenatal care for a teenager, mental health evaluations and medication services, domestic violence therapy, anger management classes, intensive therapy, transportation, child care, financial services, and intensive family preservation services. The item also was rated a Strength in cases in which imminent risk to the child was identified and immediate removal of the child from the home was deemed the most appropriate response.

In one of the two cases rated as an Area Needing Improvement for this item, reviewers noted that an assessment was not conducted and services were not provided when the agency was initially involved with the family. This lack of support resulted in a subsequent maltreatment report requiring immediate removal of the children. In the other case rated as an Area Needing Improvement, reviewers determined that the family was not provided with sufficient post-reunification services.

Stakeholders commenting on this issue were in agreement that there are sufficient services available in most areas of the State to ensure that children are maintained safely in their own homes and that DHS is effective in referring families for these services. Some stakeholders commented that the family preservation and youth diversion services are particularly successful in stabilizing the family and preventing removal. The one concern expressed by stakeholders was that needs assessments are not always sufficiently comprehensive to capture underlying issues that may be the cause of the family crisis or the maltreatment incident.

Determination and Discussion: This item was assigned an overall rating of Strength because in 91 percent of the cases, reviewers found that the agency made diligent efforts to provide services to prevent children's placement in foster care while ensuring their safety. According to the Statewide Assessment, DHS workers determine the risk of harm to children when responding to reports of abuse or neglect and then assess the response required to protect the children from harm. The Statewide Assessment also notes that

the agency's core services and services offered through the Promoting Safe and Stable Families (PSSF) Program provide a range of services as alternatives to placement for children at risk of placement.

Item 4. Risk of harm to child

 X Strength Area Needing Improvement

Review Findings: An assessment of item 4 was applicable for 38 of 50 cases reviewed. The assessment of item 4 required reviewers to determine whether the agency had made, or was making, diligent efforts to reduce the risk of harm to the children involved in each case. The assessment resulted in the following findings:

- Item 4 was rated as a Strength in 33 (87%) of the 38 applicable cases.
- Item 4 was rated as an Area Needing Improvement in 5 (13%) of the 38 applicable cases.

This item was rated as a Strength when reviewers identified the following:

- The risk of harm to children was appropriately addressed by removing the children from home and providing services to parents to address risk issues (14 cases).
- The risk of harm to children was appropriately addressed by removing the children from the home and seeking termination of parental rights (TPR) prior to or during the period under review (5 cases).
- The risk of harm to children was appropriately managed by providing services to families to address risk concerns while the children remain in the home or in a voluntary placement with relatives (12 cases).
- The risk of harm to children was appropriately addressed by removing the children from the home and placing the child with the non-custodial parent (1 case).
- Risk of harm was prevented by providing the family with post-reunification services (1 case).

The item was rated as an Area Needing Improvement when reviewers determined the following:

- The parents did not follow through with services and the children remained at risk (2 cases).
- The child, who had a history of substance abuse, ran away from a foster care placement and the agency did not appear to conduct a diligent search to find him, although members of his family knew where he was (1 case).
- No services were provided to the parents after the child was removed to address the risk issues (2 cases).

Many stakeholders commenting on this issue suggested that the agency is very competent in managing the risk of harm to children and noted that safety is a primary concern of the agency. Stakeholder also expressed the opinion that children are appropriately removed

from their homes when necessary. Several stakeholders, however, voiced concerns that after children are removed, the agency does not always provide the kinds of services necessary to ensure that children can be safely returned home. Similarly, stakeholders in one site noted that the assessments conducted as part of the maltreatment investigation sometimes miss underlying issues, such as mental health problems or domestic violence.

Determination and Discussion: This item was assigned an overall rating of Strength because in 87 percent of the applicable cases, reviewers determined that DHS made sufficient efforts to reduce risk of harm to children. A key concern noted was that after children are removed from their homes, parents may not be receiving sufficient services after their children are removed to promote safe reunification.

II. PERMANENCY

Permanency Outcome 1

Outcome P1: Children have permanency and stability in their living situations.					
Number of cases reviewed by the team according to degree of outcome achievement:					
	Denver	El Paso	Morgan	Total Number	Total Percentage
Substantially Achieved:	8	4	3	15	51.7
Partially Achieved:	7	3	3	13	44.8
Not Achieved or Addressed:	0	1	0	1	3.5
Not Applicable:	9	6	6	21	
Conformity of Statewide data indicators with national standards:					
	National Standard (percentage)	State's Data (percentage)	Meets Standard	Does Not Meet Standard	
Foster care re-entries	8.6	19.3		X	
Length of time to achieve reunification	76.2	85.7	X		
Length of time to achieve adoption	32.0	49.5	X		
Stability of foster care placements	86.7	86.9	X		
Length of stay in foster care*	N/A	12 months			

*Not used to determine substantial conformity.

STATUS OF PERMANENCY OUTCOME 1

Colorado did not achieve substantial conformity with Permanency Outcome 1. This determination was based on the following:

- 52 percent of the cases were rated as having substantially achieved Permanency Outcome 1, which is less than the 90 percent required for an overall rating of substantial conformity; and
- The State did not meet the national standard for the percentage of entries into foster care in Fiscal Year (FY) 2000 that were re-entries into care within 12 months of a prior foster care episode.

A key CFSR finding was that DHS is effective in reunifying children with their families in a timely manner. This was evident from both the case review findings and the data provided in the State Data Profile. However, DHS was found to be consistently effective in preventing re-entries into foster care, ensuring placement stability for children in out-of-home care, and establishing appropriate permanency goals in a timely manner. One concern identified pertained to establishing a goal of long-term foster care or emancipation for a child without sufficient efforts to explore other permanency options such as adoption or guardianship.

In addition to these findings, case reviewers determined that DHS was not effective in achieving the goal of adoption in a timely manner for children in five of the six adoption cases reviewed. However, the State Data Profile indicates that the percent of adoptions finalized within 24 months of entry into foster care exceeds the national standard. It is not clear why these two measures resulted in disparate findings.

Finally, both stakeholders and reviewers noted that DHS has made diligent efforts to promote permanency for children who are six years old or younger through the Expedited Permanency Program. Most stakeholders and reviewers suggested that similar efforts are needed for older children.

Findings pertaining to the specific items assessed under Permanency Outcome 1 are presented below.

Item 5. Foster care re-entries

_____ Strength X Area Needing Improvement

Review Findings: Eleven of the 50 cases were applicable to an assessment of foster care re-entries because they involved children who entered foster care at some time during the period under review. In assessing this item, reviewers were to determine whether the

entry into foster care during the period under review had occurred within 12 months of discharge from a prior foster care episode. The results of this assessment were the following:

- Item 5 was rated as a Strength in 9 (82%) of the 11 applicable cases.
- Item 5 was rated as an Area Needing Improvement in 2 (18%) of the 11 applicable cases.

Both of the cases in which the child re-entered foster care within 12 months of discharge from a prior episode concerned adolescents who had entered foster care initially because of behavior problems (in one case the child was "out of control" and in the other case the child was a sex offender), and re-entered due to the same problems.

Although stakeholders did not comment directly on this issue, many stakeholders expressed concern about the lack of post-reunification services offered to families. This may be one possible explanation for the rate of re-entry into foster care.

Determination and Discussion: This item was assigned an overall rating of Area Needing Improvement based on the following findings:

- In 18 percent of the applicable cases, reviewers determined that the children re-entered foster care within 12 months of discharge from a prior foster care episode.
- Data from the State Data Profile indicate that the rate of re-entry into foster care within 12 months for the State is 19.3 percent, which does not meet the national standard of 8.6 percent.

According to information provided in the Statewide Assessment, a State-conducted study of the foster care re-entry problem found that children aged 12 through 17 were more likely to re-enter care than younger children. The study also found that the primary reasons for re-entry were (1) child's behavior, (2) caretaker's inability to cope with child, and (3) running away. These findings are consistent with the case review findings noted above for the two cases in which re-entries occurred.

Item 6. Stability of foster care placement

____ Strength __X__ Area Needing Improvement

Review Findings: All 29 foster care cases were applicable for an assessment of Item 6. In assessing this item, reviewers were to determine whether the child experienced multiple placement settings during the period under review and, if so, whether the changes in

placement settings were necessary to achieve the child's permanency goal or meet the child's service needs. The findings of this assessment were the following:

- Item 6 was rated as a Strength in 23 (79%) of the 29 applicable cases.
- Item 6 was rated as an Area Needing Improvement in 6 (21%) of the 29 applicable cases.

The case review also found the following:

- Children in 15 cases experienced only one placement during the period under review, but in 3 of these cases the children experienced 5 or more placements prior to the period under review.
- Children in 10 cases experienced between 2 to 4 placements during the period under review.
- Children in 4 case experienced 5 or more placements during the period under review.

This item was rated as a Strength when reviewers determined that children did not experience a placement change during the period under review, or that placement changes were necessary to meet children's needs or promote attainment of their permanency goals (such as movement from a residential treatment center to a therapeutic foster home).

A rating of Area Needing Improvement for this item was assigned when reviewers made the following determinations:

- A placement disrupted when foster parents requested the child's removal, and there was no evidence that DHS had made efforts to address the needs of foster parents experiencing problems with children in their care prior to the request for removal (3 cases).
- Children experienced multiple placements during the period under review, and changes in at least one of the placements did not reflect efforts to promote goal attainment or meet the child's service needs (2 cases).
- The agency placed a child in an emergency shelter without first attempting to find a more appropriate alternative placement, such as a relative home or a foster home (1 case).

Most stakeholders commenting on this issue expressed concern regarding the number of placement changes that children in foster care experience, particularly older youths with mental health and developmental disabilities and children with severe behavioral problems. In one of the sites, stakeholders commented that the local agency's use of support services for foster families and use of relatives as foster placements increased placement stability. However, other stakeholders in this site noted that workers often place children in emergency shelters as the first placement, because they are not able to access criminal background information after hours on potential relative placements. Stakeholders in another site expressed the opinion that disruptions in foster care placements are due to a lack of training for foster parents regarding mental health issues and developmental disabilities.

Determination and Discussion: Item 6 was rated as an Area Needing Improvement because in 21 percent of the applicable cases, reviewers determined that children did not have placement stability and/ or that placement changes were not in the child's best interest. Although the State Data Profile indicates that 86.9 percent of children in foster care in the State for 12 months or less during FY 2000 had no more than two placement settings (which meets the national standard of 86.7 percent), this statistic reflects a different measure of stability than the assessment used for the CFSR case review process. Specifically, the national standard pertains only to children who have been in foster care for 12 months or less and who have had no more than two placements. In comparison, the case review process focuses on placement stability throughout the period under review for all children in the sample, regardless of the length of time they have been in foster care. The ratings for the case review are based not only on the number of placements, but also on the reviewers' assessment of the stability and appropriateness of the current placement and the reasons for placement changes. The criteria for both measures must be met for the item to be rated as a Strength.

According to the Statewide Assessment, local agencies report a shortage of foster homes and appropriate residential facilities. Thus, these agencies are not always able to assess "suitability" when a child needs an out-of-home placement. Sometimes the available space is not necessarily the best match for the child and the placement will disrupt.

Item 7. Permanency goal for child

____ Strength X Area Needing Improvement

Review Findings: All 29 foster care cases were applicable for an assessment of item 7. In assessing this item, reviewers were to determine whether the agency had established an appropriate permanency goal for the child in a timely manner. The results of this assessment were the following:

- Item 7 was rated as a Strength in 21 (72%) of the 29 applicable cases.
- Item 7 was rated as an Area Needing Improvement in 8 (28%) of the 29 applicable cases.

The assessment identified the following permanency goals for the 29 children in foster care:

- 12 children had a goal of reunification with parents or relatives.
- 9 children had a goal of long-term foster care/emancipation.
- 6 children had a goal of adoption.
- 2 children had a goal of permanent placement with relatives.

In 15 cases, children had been in care for 15 of the past 22 months. The agency had filed for and attained TPR for 7 of these children. In cases in which TPR had not been filed, compelling reasons were noted in the file.

Cases were assigned a rating of Strength for this item when reviewers determined that the agency had made diligent efforts to establish an appropriate permanency goal in a timely manner. Cases were rated as an Area Needing Improvement for this item when reviewers determined one or more of the following:

- DHS did not make sufficient efforts to explore alternative goals such as adoption or guardianship before establishing the goal of long term foster care/emancipation (4 cases)
- There was no evidence of concurrent planning so that establishing a goal of adoption was unnecessarily delayed (2 cases) (In one adoption case, the goal change did not occur until eight months after parental rights had been terminated.)
- DHS did not make diligent efforts to provide services to promote reunification or permanency placement with relatives (2 cases).

Stakeholders commenting on this issue expressed differing opinions regarding the efforts of DHS to establish appropriate permanency goals in a timely manner. In one site, stakeholders suggested that there is little use of concurrent planning, and permanency goals frequently are changed without careful consideration. In another site, stakeholders reported that the agency routinely engages in concurrent planning when a child enters foster care.

In addition, several stakeholders noted that workers tend to label some children as "un-adoptable" because of their ethnicity, disability, and/or age and are reluctant to change goals to adoption for that reason. However, stakeholders suggested that they have seen some decrease in the prevalence of this perspective in recent years.

Determination and Discussion: Item 7 was assigned an overall rating of Area Needing Improvement based on the finding that in 28 percent of the applicable cases, reviewers determined that the agency had not established an appropriate permanency goal in a timely manner. The major concerns identified were delays in changing a child's goal to adoption, a lack of concurrent planning efforts in at least one of the counties included in the onsite review, and a lack of consideration of adoption or guardianship as possible goals before establishing a goal of long-term foster care/emancipation. These findings are not consistent with information provided in the Statewide Assessment indicating that DHS has been providing training to staff in the areas of concurrent planning, Family Group Conferencing, and Mediation as part of its Expedited Permanency Program (EPP). However, as several stakeholders noted, the EPP applies only to cases in which children are age 6 or younger. There is no corresponding focus on permanency for older children.

Item 8. Reunification, Guardianship, or Permanent Placement with Relatives

X Strength Area Needing Improvement

Review Findings: Item 8 was applicable for 14 cases. In assessing these cases, reviewers were to determine whether the agency had achieved the goals of reunification, guardianship, or permanent placement with relatives for the children in a timely manner or, if the goal had not been achieved in a timely manner, whether the agency had made, or was in the process of making, diligent efforts to achieve these goals. The results of this assessment were the following:

- Item 8 was rated as a Strength for 12 (86%) of the 14 applicable cases.
- Item 8 was rated as an Area Needing Improvement for 2 (14%) of the 14 applicable cases.

Of the 14 applicable cases, children had a goal of reunification in 12 cases and a goal of permanent placement with relatives in 2 cases. The permanency goal was achieved for 7 cases. In 5 of those cases, permanency was achieved within 12 months. Four of the cases achieving permanency within 12 months were reunification cases and one was a case with a goal of permanent placement with relatives. A rating of Area Needing Improvement for this item was assigned when reviewers determined that the agency did not provide sufficient services to the family to promote or support reunification.

Stakeholders commenting on this issue were in general agreement that DHS makes diligent efforts to reunify families. While stakeholders in one site suggested that DHS is doing a better job reunifying children than it has in the past, stakeholders in another site expressed the opinion that the goal of reunification is maintained for too long. Several stakeholders voiced concern about the lack of follow-up support services after reunification.

Determination and Discussion: This item was assigned an overall rating of Strength for the following reasons:

- The State Data Profile indicates that the State's percentage of reunifications occurring within 12 months of entry into foster care (85.7%) meets the national standard of 76.2 percent.
- In 86 percent of the cases reviewed, reviewers determined that the agency had made, or was making, diligent efforts to attain the goals of reunification a permanent placement with relatives.

The Statewide Assessment attributes the agency's effectiveness in reunifying children in a timely manner to an increase in the use of concurrent planning, which has made birth parents more cognizant of the need for them to engage seriously in services or to voluntarily agree to permanency through adoption or guardianship.

Item 9. Adoption

____ Strength __X__ Area Needing Improvement

Review Findings: Six of the foster care cases were applicable for an assessment of item 9. In assessing this item, reviewers were to determine whether appropriate and timely efforts had been, or were being, undertaken to achieve finalized adoptions. The results were the following:

- Item 9 was rated as a Strength in 1 (17%) of the 6 applicable cases.
- Item 9 was rated as an Area Needing Improvement in 5 (83%) of the 6 applicable cases.

The case review also found that in 2 of the 6 applicable cases, the adoption had been finalized for the children. However, in both cases, the adoption was not finalized within 24 months of the child's entry into foster care. Three children with the goal of adoption are currently in an adoptive placement with foster parents. One child does not have an identified adoptive placement.

This item was assigned a rating of Strength in only one case. In this case, reviewers determined that the adoption was on schedule and it was highly likely that it would be finalized within 24 months of the child's entry into foster care. The item was rated as an Area Needing Improvement when reviewers determined that the agency had not made diligent efforts to achieve a finalized adoption in a timely manner. In all cases, reasons for not achieving permanency in a timely manner pertained to casework practice rather than court-related issues. These reasons were the following:

- Efforts to find an adoptive home for the child were inadequate.
- The worker did not move the case promptly to the adoption worker once the goal had changed.
- The worker did not complete the requirements for the criminal background checks.
- The foster/adoptive parents did not feel supported by the agency in the adoption process (they noted that they have been trying to adopt the child for 2 years).
- The worker did not complete the necessary procedures for filing for TPR although the child was in a foster home that wanted to adopt.

Stakeholders commenting on this issue noted that the use of concurrent planning has resulted in expediting the adoption process, although concurrent planning is not being implemented consistently throughout the State. Stakeholders identified the following factors as contributing to delays in adoption:

- Delays in transferring cases to the adoption units or in completing paperwork.

- The tendency of some workers to label children as un-adoptable because of their age or special needs. (Some stakeholders noted, that the agency does not search for adoptive homes for older African American males or for children who are developmentally delayed.)
- Reluctance on the part of some courts to seek TPR when the parents are still involved with the child.
- A State policy that allows children exiting foster care immediate access to adult services for developmental disabilities, but children who are adopted from the foster care system who need these services must be placed on a waiting list for services when they turn 21. (Stakeholders suggested that this would explain the lack of searches for adoptive families for children with developmental disabilities.)

Determination and Discussion: Although data from the State Data Profile indicate that the State's percentage of finalized adoptions occurring within 24 months of removal from home exceeds the national standard of 32 percent, this item was assigned an overall rating of Area Needing Improvement because in 83 percent of the applicable cases reviewed, reviewers determined that DHS had not made diligent efforts to achieve finalized adoptions in a timely manner. A key concern identified was that delays in achieving the goal of adoption noted in the case reviews were due to casework practices rather than to court-related or system-imposed barriers.

Item 10. Permanency goal of other planned permanent living arrangement

____ Strength __X__ Area Needing Improvement

Review Findings: Nine of the foster care cases were assessed for item 10. In assessing these cases, reviewers were to determine if the agency had made, or was making diligent efforts to assist children in attaining their goals related to other planned permanent living arrangements. The results of this assessment were the following:

- Item 10 was rated as a Strength for 5 (56%) of the 9 applicable cases.
- Item 10 was rated as an Area Needing Improvement for 4 (44%) of the 9 applicable cases.

Cases were rated as a Strength for this item when reviewers determined that the children were receiving services to help them prepare for their eventual independent living. Services included job training, tax preparation services, and Chafee Independent Living Program services.

Four cases were assigned a rating of Area Needing Improvement primarily because reviewers determined that the children were not being adequately prepared for independent living. In two cases, the workers did not know whether the children were receiving independent living services and in one case the worker did not know why a prior goal of guardianship had not been attained.

Stakeholders commenting on this issue expressed concerns about the fact that in some cases DHS will establish a goal of emancipation for children who are developmentally disabled or children who are 12 or 13 years old.

Determination and Discussion: This item was assigned an overall rating of Area Needing Improvement because in 44 percent of the applicable cases, reviewers determined that the agency had not made diligent efforts to assist children in attaining the goal of emancipation.

Permanency Outcome 2

Outcome P2: The continuity of family relationships and connections is preserved for children.					
Number of cases reviewed by the team according to degree of outcome achievement:					
	Denver	El Paso	Morgan	Total	Percentage
Substantially Achieved:	11	7	5	23	79.3
Partially Achieved:	3	1	1	5	17.2
Not Achieved or Addressed:	1	0	0	1	3.5
Not Applicable:	9	6	6	21	

STATUS OF PERMANENCY OUTCOME 2

Colorado did not achieve substantial conformity with Permanency Outcome 2. This determination was based on the finding that the outcome was rated as substantially achieved in 79 percent of the cases, which is less than the 90 percent required for substantial conformity.

Although the State did not reach the required 90 percent achievement required for substantial conformity, there were areas of strength with respect to the agency's efforts to preserve the continuity of family relationships and connections for children. For example, the CFSR found that DHS was highly effective in placing children in close proximity to their families of origin, and with their siblings and relatives, whenever possible.

A key concern identified pertained to an inconsistency in the agency's efforts to promote visitation or bonding with fathers, as reflected in the ratings for items 13, 14, and 16.

Findings pertaining to the items assessed under Permanency Outcome 2 are presented and discussed below.

Item 11. Proximity of foster care placement

☒ Strength ☐ Area Needing Improvement

Review Findings: Of the 29 foster care cases, 27 were applicable for an assessment of item 11. Cases determined to be not applicable were those in which TPR had been attained prior to the period under review or in which contact with parents was considered to be "not in the child's best interest." In assessing item 11, reviewers were to determine whether the child's foster care setting was in close proximity to the child's parents or close relatives. This assessment resulted in the following findings:

- Item 11 was rated a Strength in 25 (93%) of the 27 applicable cases.
- Item 11 was rated an Area Needing Improvement in 2 (7%) of the 27 applicable cases.

In the 25 cases rated as a Strength, reviewers determined that (1) children were placed in the same community or county as parents or relatives (20 cases), or (2) the reason for out-of-area placement was justifiable based on the children's needs (5 cases). In the two cases rated as Area Needing Improvement for this item, reviewers determined that the children were placed outside of their county of origin because of a lack of placement resources.

Stakeholders commenting on this issue expressed the opinion that the lack of specialized placements available in counties results in many children being placed out of county or out of State. Of particular concern to stakeholders was the lack of appropriate placements for juvenile sex offenders in the State, resulting in most of these children being placed in facilities in other States.

Determination and Discussion: Item 11 was assigned an overall rating of Strength because in 93 percent of applicable cases, reviewers determined that children were placed in close proximity to parents or relatives or the reason for separation was justified.

This finding is consistent with information in the Statewide Assessment indicating that DHS makes every effort to comply with the Federal requirement that a child must be placed as close to home as possible.

Item 12. Placement with siblings

☒ Strength ☐ Area Needing Improvement

Review Findings: Sixteen of the 29 foster care cases involved a child with siblings who were also in foster care. In assessing item 12, reviewers were to determine whether siblings were, or had been, placed together and, if not, whether separation was necessary to meet the needs (service or safety needs) of one or more of the children. This assessment resulted in the following findings:

- Item 12 was rated a Strength in 15 (94%) of the 16 applicable cases.
- Item 12 was rated an Area Needing Improvement in 1 (6%) of the 16 applicable cases.

In 8 of the 16 applicable cases, the child was in the same placement setting as at least one other sibling, and in 4 of these cases, the child was in the same placement setting as all of his or her siblings.

In 11 of the 12 cases in which the child was separated from some or all siblings, reviewers determined that the separation was in the best interest of one or more of the siblings, either to meet their specialized needs or protect one or more of the siblings from another sibling. Reviewers rated one case as an Area Needing Improvement for this item because DHS had not made sufficient efforts to keep the siblings together in placement.

Although stakeholders commenting on this issue generally agreed that the agency makes concerted efforts to place siblings together, they acknowledged that placing large sibling groups is challenging in many areas because of a shortage of foster families who are willing and/or able to accommodate large sibling groups.

Determination and Discussion: This item was assigned an overall rating of Strength based on the finding that in 94 percent of the cases, reviewers determined that siblings either were placed together or their separation was necessary to meet the needs of one or

more of the siblings. This is consistent with information in the Statewide Assessment indicating that Colorado enacted legislation in 2000 to ensure the placement of siblings in the same foster home.

Item 13. Visiting with parents and siblings in foster care

____ Strength __X__ Area Needing Improvement

Review Findings: An assessment of item 13 was applicable for 26 of the 29 foster care cases. Cases were not applicable if the child had no siblings in foster care, if the parents could not be located, and/or if visitation with parents was considered not in the best interests of the child. In assessing this item, reviewers were to determine (1) whether the agency had made, or was making, diligent efforts to facilitate visitation between children in foster care and their parents and siblings in foster care, and (2) whether these visits typically occurred with sufficient frequency to meet the needs of children and families. The findings of this assessment were the following:

- Item 13 was rated as a Strength in 21 (81%) of the 26 applicable cases.
- Item 13 was rated as an Area Needing Improvement in 5 (19%) of the 26 applicable cases.

The analysis of case reviews indicated the following with respect to visitation between children in foster care and their mothers:

- Visits occurred weekly in 9 cases.
- Visits occurred twice a month in 6 cases.
- Visits occurred monthly in 4 cases.
- Visits occurred less frequently than once a month in 6 cases; in 3 of these cases children had no visits with mothers.
- In 2 cases in which visitation occurred less frequently than once a month, reviewers determined that DHS had made diligent efforts to promote more frequent visitation; in 1 case in which visitation did not occur, the child's Guardian Ad Litem (GAL) was investigating whether visitation was in the child's best interest because the mother was incarcerated for the murder of one of the child's siblings.
- Visitation with mothers was not applicable in one case because TPR had been granted.

The following findings pertain to the frequency of visitation between children in foster care and their fathers:

- Visits occurred weekly in 3 cases.
- Visits occurred twice a month in 3 cases.

- Visits occurred less frequently than once a month in 9 cases, with 5 of these cases involving no visits between children and their fathers.
- In 3 cases in which visitation occurred less frequently than once a month, reviewers determined that the agency had made diligent efforts to promote more frequent visitation.
- Visitation with fathers was rated as not applicable in 14 cases because (1) the father could not be located, (2) visitation was not in the child's best interest, or (3) the father's parental rights had been terminated.

Case review findings pertaining to visitation of sibling in foster care were the following:

- Visits occurred weekly in 5 cases.
- Visits occurred twice a month in 1 case.
- Visits occurred once a month in 3 cases.
- Visits occurred less frequently than once a month in 1 case. Reviewers determined that in this case, DHS had not made diligent efforts to promote more frequent visitation.
- Visitation with siblings was rated as not applicable in 19 cases because the children were placed with their siblings or had no siblings in foster care.

Determination and Discussion: Item 13 was assigned an overall rating of Area Needing Improvement because in 19 percent of the applicable cases, reviewers determined that visitation between children and their siblings and their mothers and fathers was not of sufficient frequency to meet the needs of the children and parents. A key concern identified pertained to the inconsistency of DHS efforts to promote visitation between children and their fathers.

Item 14. Preserving connections

☐ Strength ☒ Area Needing Improvement

Review Findings: Item 14 was applicable for assessment in all 29 foster care cases. In assessing item 14, reviewers were to determine whether the agency had made, or was making, diligent efforts to preserve children's connections to family, neighborhood, community, family, faith, and friends while the child was in foster care. The assessment resulted in the following findings:

- Item 14 was rated as a Strength in 21 (72%) of the 29 applicable cases;
- Item 14 was rated as an Area Needing Improvement in 8 (28%) of the 29 applicable cases.

Case reviewers determined that in 18 of the 29 cases, children's primary connections had been "significantly" preserved while they were in foster care; in 9 of the 29 cases, children's primary connections had been "partially" preserved; and in 2 cases children's primary connections had been "not at all" preserved. There were no cases involving Native American children.

Cases were rated as an Area Needing Improvement for this item when reviewers determined that DHS had not made efforts to preserve the child's connections to biological extended family (3 cases), former foster parents (2 cases), ethnic heritage (1 case), church (1 case), and friends (1 case).

Determination and Discussion: Item 14 was assigned an overall rating of Area Needing Improvement because in 28 percent of the cases, reviewers determined that DHS had not made diligent efforts to preserve children's connections to family, former foster parents, heritage, and community of origin. As noted in the Statewide Assessment, DHS's policy of placing children with relatives helps preserve connections, and the Annie E. Casey-funded Family to Family Initiative, implemented in Denver and El Paso Counties, is effective in keeping children with their families and in their communities.

Item 15. Relative placement

 X Strength Area Needing Improvement

Review Findings: Item 15 was applicable for assessment in 26 of the 29 foster care cases. Two cases were determined to be not applicable because the children's placements were court-ordered prior to agency involvement. In assessing this item, reviewers were to determine whether the agency had made diligent efforts to locate and evaluate relatives (both maternal and paternal relatives) as potential placement resources for children in foster care. The results were the following:

- Item 15 was rated as a Strength in 23 (88%) of the 26 applicable cases.
- Item 15 was rated as an Area Needing Improvement in 3 (12%) of the 26 applicable cases.

This item was rated as a Strength when reviewers determined that children were placed with relatives (6 cases), that children were not placed with relatives but that the agency had made diligent efforts to seek relatives and assess them as a placement resource (18 cases), or that placement in a relative home was not appropriate for the children's needs (4 cases). Of the six children placed with relatives, 1 was placed with a maternal grandparent, 2 with a maternal aunt/uncle, and 3 with a paternal grandparent.

Cases were rated as an Area Needing Improvement for this item when reviewers determined that the agency had made no efforts to explore the possibility of relative placements (1 case), or that the agency had conducted only a limited exploration of potential relative placements, such as seeking and assessing maternal but not paternal relatives (2 cases).

Stakeholders commenting on this issue expressed the opinion that workers often wait for relatives to come forward and offer to take the children rather than conducting searches for potential relative placements. A few stakeholders also noted that the agency is inconsistent in its efforts to locate paternal relatives, particularly when the father is not currently involved in the child's life.

Determination and Discussion: This item was assigned an overall rating of Strength because reviewers determined that in 88 percent of the cases, the agency made diligent efforts to locate and assess relatives as potential placement resources. This finding is consistent with information reported in the Statewide Assessment that Colorado legislation and policy requires that preference be given to kinship placements when a child enters foster care. In addition, the Colorado legislature enacted legislation requiring courts to order parents to identify relatives to be considered for placement. This is usually done at the time of the Temporary Custody Hearing.

Item 16. Relationship of child in care with parents

☐ Strength ☒ Area Needing Improvement

Review Findings: An assessment of item 16 was applicable for 25 of the 29 foster care cases. A case was considered not applicable if parental rights had been terminated and parents were no longer involved with the child, or if a relationship with the parents was considered to be not in the child's best interests. In assessing this item, reviewers were to determine whether the agency had made diligent efforts to support or maintain the bond between the child and both of his/her parents through visitation and provision of services that promote bonding. The results of this assessment were the following:

- Item 16 was rated as a Strength in 20 (80%) of the 25 applicable cases.
- Item 16 was rated as an Area Needing Improvement in 5 (20%) of the 25 applicable cases.

Reviewers assigned a rating of Strength if there was evidence of one of the following: (1) regular visitation and positive interactions between parent and child, or (2) no visitation or no bond between parent and child, but efforts on the part of the agency to promote visitation and support bonding. Examples of agency attempts to promote bonding and visitation included offering family counseling, providing contracted visitation services, providing transportation for visitation, and supporting visitation even after TPR.

Reviewers assigned a rating of Area Needing Improvement to this item when they determined that the agency had not made diligent efforts to support or maintain the bond between the child and one or both of his/her parents through promoting visitation and/or providing services designed to enhance the parent-child relationship.

Determination and Discussion: Item 16 was assigned an overall rating of Area Needing Improvement because reviewers determined that in 20 percent of the applicable cases, DHS had not made efforts to support the parent-child relationships of children in foster care. However, case review findings varied, with clear indication of agency support in some cases and no efforts in this regard in other cases. A key finding was a lack of consistency in promoting children's relationship with their noncustodial fathers.

III. CHILD AND FAMILY WELL-BEING

Well-Being Outcome 1

Outcome WB1: Families have enhanced capacity to provide for their children's needs.					
Number of cases reviewed by the team according to degree of outcome achievement:					
	Denver	El Paso	Morgan	Total Number	Total Percentage
Substantially Achieved:	15	9	6	30	60.0
Partially Achieved:	4	4	5	13	26.0
Not Achieved or Addressed:	5	1	1	7	14.0
Not Applicable:	0	0	0	0	

STATUS OF WELL-BEING OUTCOME 1

Colorado did not achieve substantial conformity with Well-Being Outcome 1. This determination was based on the finding that the outcome was rated as substantially achieved for 60 percent of the cases reviewed, which is less than the 90 percent required for a determination of substantial conformity.

Although there were many cases in which DHS actively promoted efforts to ensure that families have enhanced capacity to provide for their children's needs, there also were many cases in which this effort was not made.

The CFSR found that DHS is not consistent in its efforts to identify and provide for the service needs of families or to involve them in case planning. For example, in 36 percent of the cases, reviewers determined that the needs and services of children, parents, and/or foster parents were not being met and in 28 percent of the cases, reviewers determined that parents and/or children were not being appropriately involved in the case planning process. In addition, in many cases, the frequency of face-to-face contact between agency workers and the children and parents in their cases was not sufficient to meet the needs of the children or families. A key concern noted in the CFSR process was that State policy permits telephone contact to substitute for face-to-face contact with respect to worker visits with children. Stakeholders and reviewers expressed concern that telephone contact may not be adequate to ensure children's safety and well-being.

Findings pertaining to the specific items assessed under Well-Being Outcome 1 are presented and discussed below.

Item 17. Needs and services of child, parents, foster parents

☐ Strength ☒ Area Needing Improvement

Review Findings: An assessment of item 17 was applicable for all 50 cases. In assessing the item, reviewers were to determine whether the agency had (1) adequately assessed the needs of children, parents, and foster parents; and (2) provided the services necessary to meet those needs. The results were the following:

- Item 17 was rated as a Strength in 32 (64%) of the 50 cases (18 of which were foster care cases)
- Item 17 was rated as an Area Needing Improvement in 18 (36%) of the 50 cases (11 of which were foster care cases)

The analysis of data from the case reviews revealed the following additional findings:

- Children's needs were not assessed in 8 of the 50 applicable cases and services were not provided in 5 cases. In 6 cases, reviewers determined that the services provided were not appropriate to meet the children's needs.
- Mothers' needs were not assessed and/or services were not provided in 9 of the 46 cases in which an assessment of mothers' needs was determined to be applicable.
- Fathers' needs were not assessed and/or services were not provided in 14 of the 30 cases in which an assessment of fathers' needs was determined to be applicable.
- Foster parents' needs were not assessed in 4 of the 18 applicable cases, and services were not provided in 2 of these cases.

In general, cases were rated as a Strength for this item when reviewers determined that there were no unmet assessment or service needs for children, parents, or foster parents. In cases in which comprehensive assessments were not conducted but services were provided that were deemed appropriate, reviewers rated the item as a Strength.

A rating of Area Needing Improvement was assigned to cases in which reviewers determined that DHS did not conduct an appropriate assessment of the service needs of children, parents, or foster parents, and/or had not provided the services to meet the needs identified through an assessment. In six cases rated as an Area Needing Improvement, reviewers determined that although the children received services, they still had critical service needs that were not being addressed by the agency. In three of these cases, reviewers determined that service needs were not met because the needs assessments were not sufficiently comprehensive.

Stakeholders commenting on this issue generally focused on the issue of availability of services. These comments are included under the Service Array factor in the Systemic Factors Section of the report.

Determination and Discussion: Item 17 was assigned an overall rating of Area Needing Improvement because in 36 percent of the cases, reviewers determined that DHS had not adequately addressed the needs and services of children, parents, and/or foster parents. According to the Statewide Assessment, agency policy requires that the areas of need and the services that are to be provided to address these needs must be documented for each child and parent in the case plan. Desired outcomes are addressed by specific, measurable, agreed upon, realistic, time-limited objectives and action steps to be accomplished by parents, child, service providers, county staff, or Department of Youth Corrections case manager.

Item 18. Child and family involvement in case planning

____ Strength __X__ Area Needing Improvement

Review Findings: An assessment of item 18 was applicable for all 50 cases. In assessing this item, reviewers were to determine whether parents (including pre-adoptive parents or permanent caregivers) and children (if age-appropriate) had been involved in the case planning process, and if not, whether their involvement was contrary to the child's best interest. A determination of involvement in case planning required that a parent (or child) had actively participated in identifying the services and goals included in the case plan. This assessment produced the following findings:

- Item 18 was rated as a Strength in 36 (72%) of the 50 cases (21 of which were foster care cases).

- Item 18 was rated as an Area Needing Improvement in 14 (28%) of the 50 cases (8 of which were foster care cases).

Specific findings of the review process were the following:

- Mothers were appropriately involved in the case planning process in 38 cases. In 8 cases, the mother was not involved but should have been. There were 2 cases in which the mother was not available to participate and 2 cases in which the mother's participation was considered to be contrary to the child's best interest.
- Fathers were appropriately involved in the case planning process in 16 cases. In 7 cases, the father was not involved but should have been. There were 21 cases in which fathers were not available to participate and 6 cases in which the father's participation was considered to be contrary to the child's best interest.
- Children were appropriately involved in the case planning process in 35 cases. In 8 cases, reviewers determined that the children had not been involved in case planning but were old enough to have been involved.

In general, cases were assigned a rating of Strength for this item when reviewers determined that all relevant parties had actively participated in the case planning process. Cases were assigned a rating of Area Needing Improvement when reviewers determined that one or more of the key parties had not been involved in the case planning process.

Stakeholders commenting on this issue expressed the opinion that the agency is not consistent in involving children in the case planning process. This opinion is supported by case review findings that in 8 cases, children were not involved in case planning but were old enough to have been involved.

Determination and Discussion: Item 18 was assigned an overall rating of Area Needing Improvement because in 28 percent of applicable cases, reviewers determined that DHS had not involved parents or children in the case planning process. The key concerns noted pertained to involvement of fathers and children. According to information reported in the Statewide Assessment, Colorado rules require that parents and other pertinent family members be involved in case planning throughout the life of the case. The Statewide Assessment also notes that prior to development of the treatment plan, an assessment is completed by engaging families in identifying strengths, needs, and services to address the problems that brought the family to the attention of DHS.

Item 19. Worker visits with child

____ Strength __X__ Area Needing Improvement

Review Findings: All 50 cases were applicable for an assessment of item 19. In conducting this assessment, reviewers were to determine (1) whether the frequency of visits between caseworkers and children was sufficient to ensure adequate monitoring of the child's safety and well-being, and (2) whether visits focused on issues pertinent to case planning, service delivery, and goal attainment. The results of the assessment were the following:

- Item 19 was rated as a Strength in 38 (76%) of the 50 applicable cases (22 of which were foster care cases).
- Item 19 was rated as an Area Needing Improvement in 12 (24%) of the 50 applicable cases (7 of which were foster care cases).

Reviewers noted the following with respect to typical patterns of caseworker visits with children:

- In 12 cases, visits typically occurred once a week (1 foster care case).
- In 4 cases, visits typically occurred twice a month (2 foster care cases).
- In 25 cases, visits typically occurred once a month (21 foster care cases).
- In 9 cases, visits occurred less frequently than once a month (5 foster care cases)
- In 8 cases, reviewers determined that visits did not routinely focus on issues relevant to the case plan or achieving the child's permanency goal (3 foster care cases).

This item was rated a Strength when reviewers determined that the frequency and quality of visits between workers and children was sufficient to ensure adequate monitoring of the children's safety and well-being and promote attainment of case goals. Cases were rated as an Area Needing Improvement when reviewers determined one or more of the following:

- The frequency of visits was not sufficient to meet the child's needs and/or monitor safety (10 cases)
- The visits did not focus on issues relevant to the case plan or achieving the child's permanency goal (8 cases).

Most stakeholders commenting on this issue suggested that while visitation usually is consistent with agency policy, it rarely occurs more frequently than once a month, particularly in foster care cases. Stakeholders suggested that this visitation frequency may not always be sufficient to meet the needs of the child. Several stakeholders expressed concern that telephone contact is permitted as a substitute for face-to-face contact and suggested that telephone contact may not be sufficient to meet the children's needs to monitor safety.

Determination and Discussion: Item 19 was assigned an overall rating of Area Needing Improvement because in 24 percent of the cases, reviewers determined that the frequency of caseworker visits with children was not sufficient to ensure adequate monitoring of their safety or otherwise meet their needs. According to the Statewide Assessment, DHS policy requires that workers establish monthly face-to-face or telephone contact in all in-home services cases and in foster care cases in which the child has been in a

placement for more than a month. During the first month in foster care, the policy requires bi-weekly contact. For children placed out of State, the DHS must have a minimum of one face-to-face contact yearly.

Item 20. Worker visits with parents

____ Strength __X__ Area Needing Improvement

Review Findings: An assessment of item 20 was applicable for 46 of the 50 applicable cases. Cases that were considered not applicable for an assessment of this item were those in which (1) parental rights had been terminated and the parents were no longer involved in planning for the child; or (2) the parents could not be located despite diligent efforts by the agency. Reviewers were to assess whether the frequency and quality of the caseworker's face-to-face contact with the mothers and fathers of the children were sufficient to promote attainment of the child's permanency goal or to ensure the child's safety and well being. The results of this assessment were the following:

- Item 20 was rated as a Strength in 31 (67%) of the 46 applicable cases (16 of which were foster care cases).
- Item 20 was rated as an Area Needing Improvement in 15 (33%) of the 46 applicable cases (9 of which were foster care cases).

In assessing item 20, reviewers made the following determinations regarding visits with mothers:

- Mothers were visited weekly in 9 cases (3 foster care cases).
- Mothers were visited twice a week in 3 cases (0 foster care cases).
- Mothers were visited once a month in 17 cases 9 (10 foster care cases).
- Mothers were visited less frequently than once a month in 15 cases (12 foster care cases).
- Visits with mothers were determined to be not applicable in 6 cases (5 foster care cases).
- Visits with mothers were found not to address issues pertinent to case planning and goal attainment in 5 cases (4 foster care cases).

The following determinations were made regarding visits with fathers:

- Fathers were visited weekly in 1 case (0 foster care cases).
- Fathers were visited once a month in 5 cases (1 foster care case).
- Fathers were visited less frequently than once a month in 16 cases (11 foster care cases).
- Fathers were not visited at all in 8 cases (6 foster care cases).
- Visits with fathers were determined to be not applicable in 20 cases (11 foster care cases).
- Visits with fathers were found not to address issues pertinent to case planning and goal attainment in 8 cases (6 foster care cases).

Cases were rated as a Strength for this item when reviewers determined that (1) visits were sufficiently frequent to address the parent's and children's needs and to promote attainment of the case goals, and (2) visits focused on issues pertaining to case planning, service delivery, and goal attainment. Cases were rated as an Area Needing Improvement when reviewers determined that visits were not sufficiently frequent to meet the needs of parents and children (10 cases), and/or visits did not focus on substantive case issues (8 cases).

Determination and Discussion: This item was assigned an overall rating of Area Needing Improvement because in 33 percent of the cases, reviewers determined that visits with parents were not sufficiently frequent or of sufficient quality to promote the safety and well-being of the child or enhance attainment of case goals. As noted in the Statewide Assessment, State policy permits telephone contact, while this item is rated on the basis of face-to-face contact only.

Well-Being Outcome 2

Outcome WB2: Children receive appropriate services to meet their educational needs.					
Number of cases reviewed by the team according to degree of outcome achievement:					
	Denver	El Paso	Morgan	Total Number	Total Percentage
Substantially Achieved:	20	12	10	42	91.3
Partially Achieved:	2	1	0	3	6.5
Not Achieved or Addressed:	0	0	1	1	2.2
Not Applicable:	2	1	1	4	

STATUS OF WELL-BEING OUTCOME 2

Colorado achieved substantial conformity with Well-Being Outcome 2. This determination is based on the finding that 91 percent of the cases reviewed were found to have substantially achieved this outcome, which is more than the 90 percent required for substantial conformity.

The findings for the item assessed for this outcome are presented below.

Item 21. Educational needs of the child

 X Strength Area Needing Improvement

Review Findings: An assessment of item 21 was applicable for 46 of the 50 cases reviewed. Cases that were not applicable for assessment were foster care cases in which the children were too young to be enrolled in school or preschool, or in-home services cases in which children did not have education-related issues. Reviewers were to determine whether children's educational needs were appropriately assessed and whether services were provided to meet those needs. The results were the following:

- Item 21 was rated as a Strength in 42 (91%) of the 46 applicable cases (28 of which were foster care cases).
- Item 21 was rated as an Area Needing Improvement in 4 (9%) of the 46 applicable cases (1 of which was a foster care case).

Reviewers reported the following additional findings with respect to this item:

- Educational needs were assessed in 39 of the 46 applicable cases, were not assessed in 1 case, and were not applicable for assessment in 6 cases.
- Services were provided to meet educational needs in 32 cases, services were not provided in 2 cases, and service provision was not applicable in 12 cases.
- 2 of the 29 foster care cases that should have had school records in the case file did not.
- 1 of the 29 foster parents or relative caretakers that should have received school records at the time of placement did not.
- Children in 10 cases experienced multiple school changes as a result of placement changes while in foster care.

Foster care cases were rated as a Strength for this item when reviewers determined that the agency had assessed the children's educational needs, provided services to meet those needs (if necessary), included school records in the case file, and provided school information to foster parents at the time of placement. In-home services cases were rated as a Strength for this item when reviewers determined that DHS workers had assessed potential education-related needs and assisted families in accessing services to meet those needs, when relevant.

This item was rated as an Area Needing Improvement when reviewers determined that the child's educational needs had not been assessed (1 case), or that needed educational services had not been provided (3 cases).

Stakeholders commenting on this issue expressed the opinion that DHS is effective in ensuring that children's educational needs are addressed. Several stakeholders noted that accomplishing this requires a great deal of advocacy with the schools on the part of the caseworkers and foster parents because the schools are not always responsive to the needs of children in foster care. Stakeholders in one site, however, noted that schools are responsive to the need to develop Individual Educational Plans (IEP) and obtain special education services for children in foster care.

Determination and Discussion: Item 21 was assigned an overall rating of Strength because for 91 percent of the cases, reviewers determined that DHS was effective in meeting children's educational needs. This finding is consistent with information provided in the Statewide Assessment indicating that case plans must address educational needs as a key issue, when relevant.

Child Well-Being Outcome 3

Outcome WB3: Children receive adequate services to meet their physical and mental health needs.					
Number of cases reviewed by the team according to degree of outcome achievement:					
	Denver	El Paso	Morgan	Total Number	Total Percentage
Substantially Achieved:	13	9	8	30	61.0
Partially Achieved:	8	2	3	13	27.0
Not Achieved or Addressed:	3	3	0	6	12.0
Not Applicable:	0	0	1	1	

STATUS OF WELL-BEING OUTCOME 3

Colorado did not achieve substantial conformity with Well-Being Outcome 3. This determination was based on the finding that the outcome was rated as substantially achieved in 61 percent of the applicable cases, which is less than the 90 percent required for a determination of substantial conformity.

A general CFSR finding was that DHS is inconsistent in its efforts to address children's physical and mental health needs. For example, case reviewers determined that many children did not receive either routine preventive dental services or needed dental services. Stakeholders suggested that this problem may be due in part to delays in providing Medicaid cards and the lack of providers who will accept Medicaid payments. Reviewers also found that children's mental health needs were not adequately assessed, and when mental health services were recommended, DHS did not consistently follow up to ensure that children received these services.

Findings pertaining to the specific items assessed under Well-Being Outcome 3 are presented and discussed below.

Item 22. Physical health of the child

____ Strength __X__ Area Needing Improvement

Review Findings: An assessment of item 22 was applicable for 40 of the 50 cases reviewed. Cases that were not applicable for this assessment were in-home services cases for which no physical health issues were identified. In assessing this item, reviewers were to determine whether (1) children's physical health needs had been appropriately assessed, and (2) the services designed to meet those needs had been, or were being, provided. The findings of this assessment were the following:

- Item 22 was rated as a Strength in 31 (77%) of the 40 applicable cases (23 of which were foster care cases).
- Item 22 was rated as an Area Needing Improvement in 9 (23%) of the 40 applicable cases (6 of which were foster care cases).

In general, cases were rated as a Strength when reviewers determined that the children's health needs were being routinely assessed and services provided as needed. Cases were rated as an Area Needing Improvement when reviewers determined one or more of the following:

- The child did not receive a comprehensive health assessment at entry into foster care and there was a critical need for that assessment (e.g., there was suspected sexual abuse) (5 cases).
- The child had health issues that caseworkers did not address (2 cases).
- The child did not receive dental care (2 cases).

Stakeholders commenting on this issue were in general agreement that it is difficult to obtain dental care for children in foster care because many dentists do not accept Medicaid payments. Stakeholders in one site noted, however, that in some rural communities the county child welfare agency will pay for services if they are unable to find a Medicaid provider to meet a child's needs.

Determination and Discussion: Item 22 was assigned an overall rating of Area Needing Improvement based on the finding that in 23 percent of the applicable cases, reviewers determined that DHS did not adequately address children's health needs. The findings with respect to foster care cases are not consistent with information reported in the Statewide Assessment. According to the Statewide Assessment, a child is scheduled for a full examination within 14 calendar days after placement and scheduled for a full dental exam within 8 weeks after placement. The Statewide Assessment also notes that ongoing medical and dental care is provided in a timely manner and documented in the case file.

Item 23. Mental health of the child

____ Strength __X__ Area Needing Improvement

Review Findings: An assessment of item 23 was applicable for 43 of the 50 cases reviewed. Cases that were not applicable were foster care cases in which the child was too young for an assessment of mental health needs, and in-home services cases in which the children's mental health needs were not an issue. In assessing this item, reviewers were to determine whether (1) mental health needs had been appropriately assessed and, (2) services to address those needs had been offered or provided. The findings of this assessment were the following:

- Item 23 was rated as a Strength in 31 (72%) of the 43 applicable cases (21 of which were foster care cases).
- Item 23 was rated as an Area Needing Improvement in 12 (28%) of the 43 applicable cases (7 of which were foster care cases).

For the 43 applicable cases, reviewers noted that children's mental health needs were "significantly assessed" in 32 cases, "partially assessed" in 8 cases, and "not at all assessed" in 3 cases. Reviewers also reported that mental health needs were "significantly" met in 30 cases, "partially" met in 11 cases, and "not at all" met in 2 cases.

Cases were assigned a rating of Strength when reviewers determined that children's mental health needs were "significantly" assessed and mental health service needs were "significantly" met. The item was rated as an Area Needing Improvement when reviewers determined that assessments and services were provided only partially or not at all. Some of examples of cases rated as Area Needing Improvement include the following:

- A child has severe mental retardation, but the level of mental functioning has never been assessed.
- A child who entered foster care received no mental health assessment because the caseworker indicated that there were no concerns. However, reviewers noted that the child was exposed to domestic violence and substance abuse by mother, had

separation issues with both her father and mother, and had been, at one time, kidnapped by relatives while walking home from school.

- The child has reported a compulsion to steal, but the current counseling he receives does not address that problem.
- The child did not have a mental health assessment because she said she did not want one, although there was evidence that an assessment was needed.
- A child who witnessed severe domestic violence has not received a mental health assessment, although an older sibling was assessed and is receiving services.

Stakeholders commenting on this issue expressed the opinion that DHS is not consistently effective in addressing the mental health needs of children, either through assessments or services. Stakeholders in one county also expressed concern that there is a lack of supervision of children in foster care who are taking psychotropic medications because local mental health providers do not monitor use.

Determination and Discussion: Item 23 was assigned an overall rating of Area Needing Improvement because in 28 percent of the applicable cases, reviewers determined that DHS did not adequately address children's mental health needs.

SECTION 2: SYSTEMIC FACTORS

IV. STATEWIDE INFORMATION SYSTEM

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	3	4X

STATUS OF STATEWIDE INFORMATION SYSTEM

Colorado is in substantial conformity with the factor of Statewide Information System. Findings with respect to the item assessed for this factor are presented below.

Item 24. State is operating a statewide information system that, at a minimum, can readily identify the status, demographic characteristics, location, and goals for the placement of every child who is (or within the immediately preceding 12 months, has been) in foster care.

 X Strength Area Needing Improvement

Item 24 has been assigned a rating of Strength because the State has the automated capacity to track the required information on children in foster care, such as their status, demographic characteristics, location, and goals.

According to the Statewide Assessment, Colorado began implementing a SACWIS system, called Colorado Trails, during the spring of 2001. The automated case management system includes the following features: recording referrals, family demographics, case dispositions, permanency goals, out-of-home placements, results of reviews, services provided, names of service providers, payroll of service providers, service provider's licensure information, court petition types, scheduled and held court hearings, and court findings and orders.

Colorado Trails incorporates the functionality of Colorado's Central Registry for Child Protection (CRCP). State statute directs the operation of the automated registry, which provides for the recording of substantiated child abuse and neglect incidents, including child and family demographics, the nature and severity of the maltreatment, and demographic information about the alleged perpetrator.

As noted in the Statewide Assessment, Colorado Trails is accessible to all State child welfare staff, administrative review staff, technical and accounting managers, and county departments of human/social services. It allows searches by name or other identifiers, creates online and batch management reports, and interfaces with other State information systems such as CHATS, the Statewide child-care information system, and MMIS, the Medicaid information system.

Stakeholders commenting on this issue were in agreement that Colorado Trails is an improvement over the prior information systems and that it can readily identify the status, demographic characteristics, location, and goals for children in foster care. Stakeholders also noted that they anticipate that the system will be fully useful in 2 to 3 years. Stakeholders identified the following concerns regarding the system:

- It "crashes" on a fairly frequent basis.
- It is not being used consistently across the State, making the accuracy of data/reports questionable.
- Although training is helpful, there is no comprehensive user manual available after training.
- It requires multiple entries of the same information.
- It is difficult to print some screens or create reports from the system.

In one site, stakeholders suggested that it would be useful if the system could generate more management reports designed to facilitate workload analysis and planning.

V. CASE REVIEW SYSTEM

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2X	3	4

STATUS OF CASE REVIEW SYSTEM

Colorado is not in substantial conformity with the systemic factor of Case Review System. Findings with regard to specific items assessed for this factor are presented below.

Item 25. Provides a process that ensures that each child has a written case plan to be developed jointly with the child's parent(s) that includes the required provisions.

☐ Strength ☒ Area Needing Improvement

Item 25 has been rated as an Area Needing Improvement because, although the State has requirements for developing case plans jointly with parents, the results of the onsite review and the survey of parents conducted by the Administrative Review Division (ARD) indicate that many parents are not involved in the case planning process, particularly fathers.

According to the Statewide Assessment, Colorado statute requires that an individual case plan be in place for all children and families in every instance in which a case is open beyond the point of investigation, whether or not the children involved are placed out-of-home or under court supervision. The Statute also requires that this plan be developed with the input or participation of the family and State rule requires that the parents and other pertinent family members be involved in case planning throughout the life of the case. The plan, which is called a Discrete Case Plan (DCP) for youth committed to the Division of Youth Corrections (Colorado Tribes also use the DCP format) and a Family Services Plan (FSP) for all children receiving child welfare services, is required to be completed within 60 days of case opening or out-of-home placement.

As noted in the Statewide Assessment, since 1997, ARD has conducted annual Client Satisfaction Surveys in the State to determine whether parents had an opportunity to participate and express their views in the case planning process. In 2001, the survey findings were that 59 percent of parents of children in foster care and 68 percent of parents of children in youth corrections reported that they were involved in the development of the service plan for their child and family. However, the Statewide Assessment also reported the results of Administrative Review information indicating that in 2001, 92 percent of parents and 96 percent of children were involved in case planning. In the Statewide Assessment, the discrepancy between the two findings is attributed to the fact that this issue is explored more thoroughly in the administrative review process. However, it also is possible that definitions of involvement differ between Administrative Review members and parents. The findings of the CFSR case review process fall between the findings of the two State studies, with reviewers determining that parents and children were appropriately involved in case planning in 72 percent of the cases reviewed.

Stakeholders commenting on this issue expressed the opinion that DHS is effective in establishing case plans for all children who are served through child welfare or DYC. However, stakeholders also indicated that although mothers are fairly frequently involved in case planning, fathers and children are less likely to be involved in the process. In addition, stakeholders commented that although the State has provided training in Family Group Conferencing, this practice is not being implemented consistently as part of the case planning process. Family Group Conferencing is generally used to determine placement options and/or to finalize a permanency goal. Some stakeholders suggested that more emphasis on Family Group Conferencing would ensure the involvement of all relevant parties in the case planning process.

Item 26. Provides a process for the periodic review of the status of each child, no less frequently than once every 6 months, either by a court or by administrative review.

☒ Strength ☐ Area Needing Improvement

Item 26 has been assigned a rating of Strength because the Department's ARD has a well-developed and structured process for assuring that periodic reviews of children in foster care are conducted in a timely manner.

According to the Statewide Assessment, in 1991, Colorado established the Administrative Review System to provide an independent review every 6 months of the safety, well-being, and progress toward permanency for all children in out of home care in both the child welfare and youth corrections systems. The Administrative Review System is an independent review system and may substitute for court reviews if so ordered by the court.

Most stakeholders commenting on this issue agreed that court reviews and ARD reviews are occurring at least every 6 months, in accordance with State Statute. Stakeholders also agreed that the reviews are generally productive, but that sometimes the foster parents' input is not heeded.

Item 27. Provides a process that ensures that each child in foster care under the supervision of the State has a permanency hearing in a qualified court or administrative body no later than 12 months from the date the child entered foster care and no less frequently than every 12 months thereafter.

☐ Strength ☒ Area Needing Improvement

This item was assigned a rating of Area Needing Improvement because of concerns that the required 12-month permanency hearings are not being held in a timely manner and concerns that the Administrative Review Division conducts permanency hearings for children in foster care committed to DYC.

According to the Statewide Assessment, Colorado State statute requires that the court conduct permanency hearings no later than 12 months after the date the child/youth is considered to have entered foster care and no later than every 12 months thereafter for all children who are the subjects of Dependency and Neglect Petitions and Petitions for Review of Need for Placement. If a child is under 6 years of age at the time a petition is filed, a permanency hearing is held no later than 3 months after the decree of disposition, in accordance with provisions of the Expedited Permanency Planning Initiative.

The Statewide Assessment notes that over the last 3 years there has been a steady improvement in compliance with the 12-month permanency hearing requirement with the Child Welfare system. However, once a youth is committed to DYC, the court's jurisdiction ends. The Statewide Assessment also notes that there are expectations that the number of hearings that are held in a timely manner will increase, and that court orders will reflect appropriate language as court personnel become more familiar with AFSA requirements. As indicated in the Statewide Assessment, DHS and the State Court Administrator's Office have been providing AFSA training to judges, magistrates, court personnel, and county attorneys throughout the State.

Stakeholders commenting on this issue were in general agreement that the 12-month permanency hearings are not being held in a timely manner. Stakeholders in one county included in the onsite assessment noted that the agency and county attorneys are not diligent about setting hearing dates in a timely manner. Stakeholders in another county expressed the opinion that the local agency in that county "does not pay attention to permanency goals and timeframes." Stakeholders in the third county reported that the county attorney and agency are inconsistent in getting cases on the court docket in a timely fashion. Several stakeholders suggested, however, that DHS is effective in making sure that permanency hearings are held in a timely manner for younger children, particularly for children age 6 and younger, because of the Expedite Permanency Planning initiative.

Another concern with regard to permanency hearings is when the court's jurisdiction ends for children committed to DYC, permanency hearings for those children who are in foster care placements are conducted by the Administrative Review Division, rather than by the court or an administrative body that is not a part of the State agency, which is inconsistent with the definition of a permanency hearing in 45 CFR 1355.20.

Item 28. Provides a process for termination of parental rights proceedings in accordance with the provisions of the Adoption and Safe Families Act.

☐ Strength ☒ Area Needing Improvement

This item was rated as an Area Needing Improvement because the agency's attention to termination of parental rights (TPR) is based on the age of the child, rather than the child's status or case circumstances. While the State has made notable gains in expediting permanency for children under age 6 through the Expedited Permanency Planning initiative, there was not evidence in the onsite review that the same attention is given to TPR for older children.

The Statewide Assessment notes that local agencies are required to file for a TPR no later than the end of the 15th month of placement for every child who has been in foster care under the responsibility of the State for 15 of the last 22 months, unless there is a compelling reason submitted to the court identifying why it is in the child's best interest to not have parental rights terminated.

Stakeholders commenting on this issue expressed different opinions regarding the effectiveness of the agency in meeting ASFA provisions regarding filing for TPR. According to some stakeholders, the State does meet ASFA requirements and has implemented procedures for searching for absent parents in order to expedite the process. Stakeholders noted that DHS has been particularly effective in seeking TPR in a timely manner for children age 6 and younger (as part of the Expedited Permanency Planning initiative).

However, other stakeholders commented that ASFA guidelines are not consistently implemented, particularly for children who are older than 6 years old. In one of the sites, stakeholders reported that there often is little follow up after the agency requests a filing for TPR. This was attributed in part to the fact that the local county attorney requires a high level of evidentiary requirements before he will proceed with TPR because the courts in that county are generally reluctant to proceed with the TPR process.

Item 29. Provides a process for foster parents, preadoptive parents, and relative caregivers of children in foster care to be notified of, and have an opportunity to be heard in, any review or hearing held with respect to the child.

☒ Strength ☐ Area Needing Improvement

This item was assigned a rating of Strength because there are provisions in place to notify foster parents, pre-adoptive parents, and related caregivers of hearings and reviews. The State's major strength in meeting this requirement is in providing notification of

periodic reviews conducted by the ARD. However, although there are provisions in place to provide notification of court hearings, these are not implemented consistently.

According to the Statewide Assessment, State statute requires the court to provide notice of all hearings and reviews ". . . to all parties to the case and to foster parents, pre-adoptive parents or relatives, so that such parties are provided the opportunity to be heard at such hearings and reviews." Notices are to be sent by the county social services agency or by the DYC Region Office at least 2 weeks in advance of scheduled reviews. The Statewide Assessment also reports that, normally, notice of subsequent court hearings is provided at the current court hearing and all parties receive a mailing containing the next court date.

Stakeholders commenting on this issue expressed the opinion that while the ARD provides notification of 6-month Administrative Reviews to foster parents, pre-adoptive parents, and relative caregivers on a routine basis, notification of court hearings is less consistent. Stakeholders also noted, that even when relevant parties are notified, foster parents and children are not always encouraged to participate, depending upon the court.

VI. QUALITY ASSURANCE SYSTEM

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	3	4X

STATUS OF QUALITY ASSURANCE SYSTEM

Colorado is in substantial conformity with the factor of Quality Assurance System. Findings with respect to the specific items assessed for this factor are presented below.

Item 30. The State has developed and implemented standards to ensure that children in foster care are provided quality services that protect the safety and health of the children.

☒X___ Strength ___ Area Needing Improvement

This item is rated as a Strength because the State has standards in place that appropriately address the safety and health of children in foster care.

As noted in the Statewide Assessment, State standards and licensing/certification requirements emphasize child safety and health, and are applied to all foster, adoptive, and kinship care homes. DHS rules require local agencies and Child Placement Agencies (CPAs) to complete a thorough evaluation of foster homes annually in order to "... promote and encourage child care in environments that contribute to the safety, health, protection, and well being of children." In evaluating foster homes, CPAs must conduct unannounced visits so that they are seeing the homes as the foster children experience them on a daily basis. Staff from the certifying authority are required to visit homes monthly to observe the interaction of the foster parent(s) with the foster children. Also, to address safety, the local worker for the child is required to visit the child in the foster home bi-monthly and see where the child sleeps.

DHS licensing staff conduct licensing visits to State licensed facilities biannually, although they will visit the facility more frequently if there are licensing or program concerns. In 2000, DHS instituted a 24-hour monitoring team in the Division of Child Care that more closely monitors private CPAs that certify foster homes and Residential Child Care Facilities (RCCF).

Stakeholders commenting on this issue noted that the standards established by the State are comprehensive and relevant. Stakeholders noted that there are standards in place that pertain to areas such as cleanliness, nutrition, use of restraints, supervision, safe living spaces, and background clearances for staff/providers. Stakeholders also reported that teams such as the Child Protection Team (CPT) and the Colorado Assessment Continuum (CAC) monitor cases for safety and health concerns.

Despite these generally positive views, stakeholders in one county included in the onsite review indicated that high staff turnover in that county has a negative impact on the ability of DHS to effectively monitor the health and safety of children who are in out-of-home placements.

Item 31. The State is operating an identifiable quality assurance system that is in place in the jurisdictions where the services included in the CFSP are provided, evaluates the quality of services, identifies strengths and needs of the service delivery system, provides relevant reports, and evaluates program improvement measures implemented.

☒X___ Strength ___ Area Needing Improvement

This item is rated as a Strength because DHS operates a comprehensive quality assurance system which 1) establishes desired outcomes and indicators for tracking performance, 2) produces performance data from case reviews and stakeholder surveys, and 3) uses the performance data for quality improvement processes.

The State's quality assurance system contains multiple components including:

- Administrative reviews of 100 percent of all children/youth in out-of-home care for at least 6 months.
- Reviews of a statistically valid random sample of all cases opened for in-home services.
- Reviews of the services provided by out-of-home placement providers.
- Reviews of compliance with licensing and certification requirements.
- Reviews of specific county programs.
- Data collection, analysis, and reporting.
- Satisfaction surveys.
- Focus groups, community forums, and stakeholder involvement in program design, implementation, and evaluation.
- Training/educational opportunities for employees to ensure a competent, proficient staff.
- Quality improvement mechanisms to continually evaluate and improve access to effective service delivery systems.
- Commitment to analyzing and improving case and program outcomes and indicators.

The Statewide Assessment notes that Colorado's quality improvement system has established outcomes of safety, permanence and well-being. A data analyst has recently been hired to work with the ARD Steering Committee to define and develop reports that clearly identify programmatic strengths and areas needing improvement with respect to attaining these outcomes.

The Administrative Review Division conducts comprehensive case reviews that exceed the requirements for periodic 6-month reviews of children in foster care, and include reviews of children and families who receive services in their own homes. The administrative reviews assess whether children's needs are being met with regard to safety, special needs, cultural needs, health, education, and mental health. The administrative reviews evaluate the child's progress while in foster care, the parent's progress, visitation, compliance with the treatment plan, due process, appropriateness of services, continuing necessity for and appropriateness of the placement, barriers to permanency, whether additional or different services are needed, appropriateness of the permanency goal and date to be achieved, and reasonable efforts to achieve permanency. The ARD also provides quality assurance reviews of children who are served in their homes.

Stakeholders commenting on this issue generally agreed that there are sufficient quality assurance mechanisms in place. Some stakeholders indicated that managers do not always use the ARD reports effectively to direct practice and policy.

VII. TRAINING

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	3X	4

STATUS WITH RESPECT TO TRAINING

Colorado is in substantial conformity with the systemic factor of Training. Findings with respect to items assessed for this factor are presented below.

Item 32. The State is operating a staff development and training program that supports the goals and objectives in the CFSP, addresses services provided under titles IV-B and IV-E, and provides initial training for all staff who deliver these services.

 X Strength Area Needing Improvement

This item is rated as a Strength because the State has a pre-service staff training program in place that addresses the skills and information needed for staff to perform their jobs.

According to the Statewide Assessment, Colorado offers a comprehensive multi-disciplinary training program for child welfare supervisors and workers. The training program was developed based on the findings of a Statewide needs assessment. Newly hired child welfare caseworkers are required to complete a 30-hour computer-based training program prior to receiving their first case, 60 hours of structured on-the-job training within their first 3 months, and 12 days of core training within their first year. Newly hired or promoted child welfare supervisors are required to complete 12 days of supervisory core training within 6 months of hire or promotion.

As indicated in the Statewide Assessment, the computer-based training program addresses the content areas of case planning, cultural sensitivity, confidentiality, documentation, domestic violence, investigation, risk assessment, reasonable efforts, substance abuse, and medical aspects of child abuse/neglect. The focus areas for the 12 days of core training are family preservation and protection for abused, neglected, and sexually abused children; case planning and family-centered casework; the effects of abuse and neglect on child development; and separation, placement, and reunification in child welfare. New supervisor training covers administrative supervision, case consultation, educational supervision, and supportive supervision.

Most stakeholders commenting on this issue praised the training for new caseworkers and new supervisors. Stakeholders identified some gaps in training including training on clinical supervision (for supervisors), sexual abuse treatment (for all workers), ICWA, cultural differences, grief and loss, and the developmental needs and behavioral issues of adolescents.

Several stakeholders expressed concern about whether workers are actually meeting the requirement of 12 days of core training. These stakeholders noted that sometimes there is a 2-to 3-month wait for training, and that it is difficult for many workers to schedule training and actually attend once they are carrying a full caseload.

Item 33. The State provides for ongoing training for staff that addresses the skills and knowledge base needed to carry out their duties with regard to the services included in the CFSP.

☒ X_ Strength ☐ Area Needing Improvement

Item 33 was rated as a Strength because, the State has provisions and requirements in place for ongoing staff training.

According to the Statewide Assessment, DHS offers 29 specialized and advanced trainings that are provided at various times throughout the year on a Statewide basis. The Statewide Assessment notes that child welfare caseworkers must complete a minimum of 6 hours of in-service training annually; however there is no requirement for in-service training for supervisors. During the period under review, a total of 2,504 supervisors, caseworkers, and foster parents attended the trainings. DHS also works closely with the schools of social work and offers educational stipends at both the Bachelor's and Master's level for current employees and persons seeking employment in local agencies.

Stakeholders commenting on this issue expressed differing views regarding ongoing training. For the most part, stakeholders indicated that DHS makes concerted efforts to provide training opportunities that will help staff build knowledge and skills. However, several stakeholders in one county reported that there is an insufficient amount of training available at the local level for workers and supervisors to fulfill the 6-hour requirement. Stakeholders in this county noted that loss of training funds from the county has severely impacted ongoing training. Stakeholders in another county expressed the opinion that caseworkers are frustrated by some of the DHS-offered training because it is provided in sequenced sessions. Consequently, if they miss the first session, they may have to wait months before it is offered again.

Stakeholders also noted that community partners such as law enforcement and mental health professionals are invited to all agency training events, and agency workers usually are invited to attend trainings offered by these disciplines.

Item 34. The State provides training for current or prospective foster parents, adoptive parents, and staff of State licensed or approved facilities that care for children receiving foster care or adoption assistance under title IV-E that addresses the skills and knowledge base needed to carry out their duties with regard to foster and adopted children.

_____ Strength X Area Needing Improvement

Item 34 was rated as an area needing improvement because of the issues concerning access to pre-service and ongoing training by foster parents.

As noted in the Statewide Assessment, Colorado offers a comprehensive multi-disciplinary training program for foster parents and service providers. This foster parent training program focuses on many of the same topics as the child welfare staff training. Foster parents are required to complete 12 hours of pre-certification training before being licensed. In addition, foster parents are required to complete 20 hours of ongoing training annually to maintain their licenses. Foster parent training covers the court process; the placement process; separation and loss; child abuse, neglect, and sexual abuse; child development; discipline; and working with birth parents. Foster parents are able to meet their ongoing training requirement of 20 hours annually by attending any of the 29 specialized and advanced training topic seminars that DHS offers to caseworkers.

Prospective adoptive parents are not required by Colorado law or policy to attend training, although in 10 of the larger counties in the State (which are responsible for 90 percent of the adoptive placements in the State), training is required for prospective adoptive

parents. All prospective adoptive parents are invited to training for foster parents and other appropriate training and can participate if they choose.

Most stakeholders commenting on this issue expressed concern about access to foster parent pre-service and ongoing training. These stakeholders noted that many foster parents are not able to participate in training because of the need to travel long distances to access training; training is not always offered in the foster parent's language; and child care services are not available to assist foster parents in participating in training. Stakeholders also reported that many foster parents receive children prior to completing pre-service training because they are unable to access the training.

Stakeholders suggested that in addition to the topics currently covered by the training, foster parents would benefit from training in juvenile delinquency, medication, cultural sensitivity, and behavior management.

VIII. SERVICE ARRAY

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	3 <u>X</u>	4

STATUS WITH RESPECT TO SERVICE ARRAY

Colorado is in substantial conformity with the systemic factor of service array. Findings pertaining to the specific items relevant to this factor are presented and discussed below.

Item 35. The State has in place an array of services that assess the strengths and needs of children and families and determine other service needs, address the needs of families in addition to individual children in order to create a safe home environment, enable children to remain safely with their parents when reasonable, and help children in foster and adoptive placements achieve permanency.

X Strength Area Needing Improvement

Item 35 was rated as a Strength because the State has the necessary array of services in place.

According to the Statewide Assessment, DHS has mandated a Statewide set of core services. Core services, which are considered family preservation services, are designed to provide services to families with children at imminent risk of being placed out of the home because of abuse and/or neglect, or to families that have been recently reunified. The core services include Home Based Interventions, Intensive Family Therapy, Life Skills, Day Treatment, Sexual Abuse Treatment, Special Economic Assistance, Mental Health Services, Substance Abuse Treatment Services, Aftercare Services, and County Designed Services.

In addition to the core services program, Colorado's Promoting Safe and Stable Families (PSSF) Program is active in 34 counties and the Ute Mountain Ute Indian Reservation. The program provides family support (prevention) activities and family preservation (crisis) services for families and children and is accessed either through the local DHS or the designated fiscal agency within that region. The most common services and activities provided are family advocacy, individual family support plans, support groups, home visitation, flexible funding, respite, parenting classes, mentoring, kinship care certification, family group conferencing facilitation, and referrals to other services. Also, local agencies have used Temporary Assistance to Needy Families (TANF) funding for a variety of services. However, as noted in the Statewide Assessment, families cannot receive services funded by the Core Services program and by TANF.

Stakeholders commenting on this issue expressed the opinion that there is a wide array of services available statewide and that PSSF and TANF-funded programs have been particularly useful in expanding services to families. For example, stakeholders noted that in one county, PSSF advocates have been a major resource for Latino families with language barriers. In another county, stakeholders commented that the use of TANF funds has increased in-home services four-fold.

Stakeholders identified the following gaps in services:

- Insufficient bilingual services.
- Insufficient mental health services, particularly high quality mental health services.
- Insufficient services for children transitioning from foster care to independent living, such as transitional living services.
- Insufficient substance abuse treatment services.
- Lack of services for juvenile sex offenders.
- Lack of services for developmentally delayed children.
- Insufficient numbers of medical and dental care providers who accept Medicaid payments.

Item 36. The services in item 35 are accessible to families and children in all political jurisdictions covered in the State's CFSP.

☐ Strength ☒ Area Needing Improvement

This item was rated as an Area Needing Improvement because some specialized services are not available in all of the rural areas. Families have to travel long distances in some rural areas to access services.

As noted above, the Statewide Assessment reports that DHS has mandated that all local agencies provide the core services that comprise the basics of child welfare service provision. According to the Statewide Assessment, the 64 local agencies are responsible for the investigation of child abuse/neglect allegations and primary services to keep children safe and to assist them in achieving permanency and stability. Services are provided directly by local agency staff, licensed providers, and collateral agencies such as the local mental health center, school, or other community-based agencies. However, stakeholders commenting on this issue noted that some services, particularly specialized services such as bilingual services, are not uniformly available across the State. Stakeholders also noted that families in the rural areas of the State often must travel long distances to access services.

Item 37. The services in item 35 can be individualized to meet the unique needs of children and families served by the agency.

☒ Strength ☐ Area Needing Improvement

This item was rated as a Strength because the agency has the capacity to individualize services to children and families, although in some areas, gaps in the service array affect this capacity to some extent.

Most stakeholders commenting on this issue expressed the opinion that local agencies are able to individualize services for children and families. However, some stakeholders also noted that efforts to individualize services are hindered by lack of services such as in-patient substance abuse, juvenile sex offender treatment, and services for the developmentally delayed. In one county, stakeholders suggested that there is a lack of sensitivity to the needs of perpetrators and victims of sexual abuse. In all counties, stakeholders suggested that meeting the needs of different cultural populations (such as Latinos) is challenging. In general, stakeholders agreed

that the ability to individualize services has been greatly enhanced by the availability of PSSF and TANF funds to augment existing services.

IX. AGENCY RESPONSIVENESS TO THE COMMUNITY

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	3	4X

Item 38. In implementing the provisions of the CFSP, the State engages in ongoing consultation with tribal representatives, consumers, service providers, foster care providers, the juvenile court, and other public and private child- and family-serving agencies and includes the major concerns of these representatives in the goals and objectives of the CFSP.

 X Strength Area Needing Improvement

This item has been rated as a Strength because the agency engages in extensive efforts to collaborate with other agencies or organizations, both locally and at the Statewide level.

According to the Statewide Assessment, Colorado's planning for the 2000-2004 CFSP included an extensive community consultation process to ensure the participation of a broad spectrum of public and private agencies, community-based organizations, and parents and youth who have had past or present involvement with the Child Welfare system, as well as representation from culturally diverse populations. The process also included input from representatives of other State and Federally funded programs such as: the Colorado Children's Trust, homeless youth programs, the Department of Housing, and the Division of Criminal Justice. Ten regional focus groups were convened throughout the State with the purpose of generating discussion and recommendations regarding the current array of services, while identifying strengths, challenges, and areas of need. DHS staff provided information for the steering committee and focus groups.

The Statewide Assessment also noted that the PSSF Program requires areas of the State receiving PSSF funding to have a Community Advisory Commission that oversees the services being provided by the local project. The responsibilities of the Community Advisory Council include promotion of coordinated services, prevention of duplication, and addressing issues with service accessibility and delivery. The intent is to examine available services and to provide feedback to make the service system more effective and culturally responsive for families and children in that area.

Finally, the State-established Stakeholder Committee reported that two counties have established processes whereby advocates, parents, and representatives from different disciplines meet regularly to address the effectiveness of the child-serving system and to discuss concerns.

Stakeholders commenting on this issue reported that local agencies put a great deal of effort into collaborating with State and local agencies, private providers, and other community stakeholders in the planning process. Stakeholders felt that a strong collaborative relationship between child welfare and the Mental Health Assessment and Service agency is lacking. In one of the counties included in the onsite review, stakeholders suggested that collaboration with the juvenile justice system was problematic.

With regard to tribal collaborations, stakeholders noted that the Ute Tribes work well with local agencies; the Denver Indian Family Resource Center assists metropolitan counties with ICWA compliance; and the Statewide ICWA taskforce identifies issues and appropriate strategies for collaboration. Stakeholders in one of the counties noted that there is a full-time ICWA specialist at the local child welfare agency who focuses on Native American issues and ICWA compliance.

Stakeholders in one of the counties included in the onsite review were particularly positive about the collaborative efforts of the local agency. These stakeholders noted that there is excellent collaboration and sharing of resources and an overall focus on improving outcomes for children and families. The stakeholders also noted that the local agency is open to criticism and suggestions for procedural changes and improvements, and meets with many other agencies on a monthly basis.

Item 39. The agency develops, in consultation with these representatives, annual reports of progress and services delivered pursuant to the CFSP.

☒ Strength ☐ Area Needing Improvement

This item has been rated as a Strength because DHS consults with stakeholders on developing the IV-B plan.

According to the Statewide Assessment, DHS, in order to complete the Annual Progress and Services Report for the Child and Family Services Plan (CFSP), asked a small segment of community and agency stakeholders to provide information regarding accomplishments and challenges in implementing the CFSP, as well as feedback regarding changes in the plan, and confirmation when a goal or strategy had been accomplished.

Stakeholders commenting on this issue expressed the opinion that the State involves a range of stakeholders in developing its IV-B plan.

Item 40. The State's services under the CFSP are coordinated with services or benefits of other Federal or federally assisted programs serving the same population.

☒ Strength ☐ Area Needing Improvement

This item was rated as a Strength because DHS is effective in its efforts to coordinate services with other agencies and organizations.

According to the Statewide Assessment, DHS has strongly promoted coordination of services with public and private agencies. Colorado has used Child Abuse Prevention and Treatment Act (CAPTA) funds to promote coordination across systems and has sponsored training and projects that involve the participation of providers from various agencies. The State Institutional Abuse Review Team, comprised of professionals from Child Welfare, Mental Health, Youth Corrections, Child Care Licensing, Developmental Disabilities, and the Alcohol Drug Abuse Division (ADAD), reviews all reports of investigation of abuse of children in 24 hour out-of-home care settings to determine adequacy of investigations, recommend needed corrective action, and assess overall safety on licensing concerns. To support local agencies forming partnerships in the community, joint technical assistance and training of local agencies, community agencies, and citizens has been sponsored using CAPTA funds as well.

As noted in the Statewide Assessment, other agencies or organizations with which DHS has coordinated services include the Annie E. Casey Foundation (Family to Family Initiative), the State Office of Self-Sufficiency (to use TANF funding for prevention and intervention services), the Division of Self-Sufficiency, and the Colorado Coalition Against Domestic Violence. However, according to the Statewide Assessment, although many efforts have been attempted to facilitate the coordination of services, the Stakeholder Committee provided feedback indicating that only 26 percent of the stakeholders perceive that this coordination is working well. The

Statewide Assessment also noted that, across the State, the perception of how well local agencies coordinate with other agencies was found to range from excellent to poor.

During the CFSR, stakeholders commenting on this issue noted that DHS coordinates effectively with other agencies. However, stakeholders also noted that the agency's efforts to coordinate services with the mental health agency are not as effective as they need to be to ensure that children's and families' mental health needs are being met.

X. FOSTER AND ADOPTIVE PARENT LICENSING, RECRUITMENT, AND RETENTION

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	3 <u>X</u>	4

STATUS WITH REGARD TO FOSTER AND ADOPTIVE PARENT LICENSING, RECRUITMENT, AND RETENTION

Colorado is in substantial conformity with the systemic factor of Foster and Adoptive Parent Licensing, Recruitment, and Retention. Findings for the items pertaining to this factor are presented below.

Item 41. The State has implemented standards for foster family homes and child care institutions which are reasonably in accord with recommended national standards.

 X Strength Area Needing Improvement

Item 41 was assigned a rating of Strength because the State has implemented the necessary standards for foster family homes and child care institutions.

According to the Statewide Assessment, DHS has maintained standards for foster homes and residential facilities since 1963. The current law (the Child Care Licensing Act), which governs the licensing and certification of foster homes and residential facilities, defines the types of foster homes and facilities, requires licensing, and lists areas for which DHS may develop standards.

The Statewide Assessment also notes that foster home certificates, which currently are issued for 3 years, will change to a 1-year certificate in response to 2001 legislation. Specialized Group Facility and RCCF licenses are permanent. Facilities with permanent licenses are required to submit annually a continuation declaration and are subject to an annual inspection visit by the Division of Child Care licensing staff to assure compliance with Core Standards. Non-compliance will trigger a Report of Inspection outlining the violations and timeframes for completion.

As noted in the Statewide Assessment, the State developed a manual called *Quality Standards for 24 Hour Care*. The manual includes regulations to address common issues applied to all types of programs, such as discipline, children's rights, religion, education, community participation, physical restraint, food and nutrition, clothing, personal belongings, and training and orientation of both foster parents and facility staff. Individual sets of regulations for foster homes, specialized group homes, and RCCFs contain specific facility requirements, staff/personnel requirements, and any other standard that is specific only to that type of facility. These regulations are reviewed and updated every 3 to 5 years or whenever there have been relevant changes in Federal and/or State laws.

Stakeholders commenting on this issue reported that the State has licensing standards for all foster homes and facilities, including kinship homes that address appropriate areas, including sanitation, safety, space, and staffing. Stakeholders also reported that certification of foster homes by local agencies is not as prompt as certification by Child Placement Agencies (CPAs), and re-certification is not monitored as closely.

Item 42. The standards are applied to all licensed or approved foster family homes or child care institutions receiving title IV-E or IV-B funds.

☐ Strength ☒ Area Needing Improvement

Item 42 was assigned a rating of Area Needing Improvement because, although the State has the same standards for both related and non-related foster homes, it may waive the non-safety related standards for both related and non-related homes while Federal policy only allows waivers of non-safety related requirements for related homes.

According to the Statewide Assessment, DHS began combining regulations for kinship foster care and non-relative foster home providers in response to the Federal requirement. The standards were developed and were effective February 1, 2002. A State Appeal Panel will review exceptions to any non-safety standards on a case-by-case basis. Regulations were also passed requiring that private CPAs use the same criteria when completing a family assessment as county departments.

Stakeholders commenting on this issue reported that the State now has the same licensing standards for related and non-related homes. Some stakeholders suggested, however, that having the same standards for relative placements sometimes creates problems because relatives do not always meet the standards, yet they may be appropriate placements for children. Stakeholders suggested that certification requirements may be waived occasionally, but that this is an infrequent occurrence. While the State does not waive requirements that affect child safety, the State reportedly does waive other requirements for both related and non-related homes.

Stakeholders in one of the counties included in the onsite review expressed concerns that the local agency is not consistent in ensuring that all foster homes meet certification standards because of the critical need for foster homes. A stakeholder from another county mentioned that the courts in that county will order placements into non-licensed relative or non-relative homes.

Item 43. The State complies with Federal requirements for criminal background clearances as related to licensing or approving foster care and adoptive placements and has in place a case planning process that includes provisions for addressing the safety of foster care and adoptive placements for children.

☒ Strength ☐ Area Needing Improvement

Item 43 was assigned a rating of Strength because the State complies with all Federal requirements for criminal background clearances.

According to the Statewide Assessment, Colorado requires Colorado Bureau of Investigation criminal background checks on foster and adoptive parents and kinship providers. In addition, Colorado requires applicants who have lived in Colorado for less than 24 months to complete a Federal Bureau of Investigation (FBI) criminal background check. These criminal record checks also include adults over the age of 18 living in the home. In 2000, Colorado began to require that criminal record checks be received prior to the placement of a child in the home. The exception to this policy is for emergency “child specific” and kinship care placements, where the child has an existing relationship with the provider. In these situations, DHS is required to obtain fingerprints at the time of placement.

In 2001, Colorado passed legislation adopting language to assure full compliance with ASFA requirements for criminal records checks on foster and adoptive families. Colorado law mandates reasons for denial of foster and adoptive parent applications, including felony convictions involving assault, battery, or drug-related offenses within 5 years prior to application for certification or licensure; a determination of insanity or mental incompetence by a court; or a pattern of misdemeanors. These reasons are based, in part, on results of the criminal record check.

According to stakeholders, criminal background checks are completed for all foster parents.

Item 44. The State has in place a process for ensuring the diligent recruitment of potential foster and adoptive families that reflect the ethnic and racial diversity of children in the State for whom foster and adoptive homes are needed.

☒ Strength ☐ Area Needing Improvement

Item 44 was rated as a Strength because there are a lot of ongoing efforts to recruit potential foster and adoptive families, some of which focus on recruitment of African American, Hispanic and Native American foster and adoptive parents.

According to the Statewide Assessment, recruitment of foster and adoptive parents takes place at the State and county levels. Many large county agencies have specialized positions designed to enhance recruitment efforts. These positions focus on difficult-to-place children as well as recruitment of homes that represent the ethnic and racial diversity of children in the State. They have developed county-specific recruitment brochures, posters, and other creative methods to attract foster parents. Colorado recently hired a statewide recruiter and launched its first statewide recruitment campaign for foster and adoptive parents. Posters, calendars, and brochures for single parents, foster parents, sibling groups, African-American, Hispanic and Native Americans were developed. The website provides a wide range of information to families who are interested in foster care or adoption.

In order to determine Colorado's strengths and deficits in recruitment and retention, the State contracted with the American Humane Association to research effective recruitment efforts for Colorado. As a result of this study, the State developed a handbook titled "Recruitment & Retention Resources: Adoption/Foster Care," which was distributed to all county department. It contains general information for recruitment, ideas/projects for recruitment, artwork, information about special populations, educational information, and additional resources for local agencies.

Adoption incentive dollars were used to contract with a public relations firm to develop specialized statewide recruitment for foster and adoptive homes for children of color and sibling groups. Colorado's foster and adoptive parent recruitment campaign has a web page that allows prospective applicants to learn about Colorado's certification process for both foster care and adoption. There is an instructional booklet to explain the process of becoming a foster and/or adoptive parent and a toll-free number to access specific information.

DHS sponsored a workshop in 2001 for local foster care coordinators and adoption workers featuring recruitment and retention activities and strategies. This served as a kickoff to National Adoption Month, when the *Change A Life Forever* campaign was introduced. The State also actively participates in National Foster Care Month.

According to Stakeholders, although the local agencies engage in diligent recruitment of foster families, there is still a shortage of foster homes, particularly homes for adolescents, sexual offenders, children with special needs, and Native American and Spanish-speaking children. Some stakeholders also noted that there is a shortage of African American homes. Several stakeholders expressed the opinion that the limited diversity of agency staff may create barriers for recruiting a sufficiently diverse pool of foster care providers.

Stakeholders commenting on this issue cited the Annie E. Casey-funded Family to Family Initiative as an important initiative for recruiting foster families that reflect the ethnic and racial diversity of the children in foster care. This effort places a major emphasis on developing strong relationships with foster families and on recruiting homes that reflect the diversity of population, particularly Native American homes and bilingual homes. Stakeholders in another county included in the onsite review reported that the local agency has several projects and a diversity council in place to enhance recruitment of foster and adoptive families that reflect the ethnic and racial diversity of children in foster care. Stakeholders in another county reported that there were intensive local recruitment efforts including television and radio Public Service Announcements, but these efforts have not been successful in recruiting Native American or bilingual foster families.

Item 45. The State has in place a process for the effective use of cross-jurisdictional resources to facilitate timely adoptive or permanent placements for waiting children.

☒ X Strength ☐ Area Needing Improvement

This item was rated as a Strength because the State has made concerted efforts to place children across jurisdictional boundaries, when appropriate.

Over the years, Colorado has worked with agencies in Wyoming, Utah, New Mexico, and Oklahoma. There have been a number of placements with these States, as well as other States and countries. Some counties have submitted recruitment proposals to purchase post-placement services from other counties or from out-of-State agencies for some of the children who have waited the longest, and they have been successful in achieving adoptive homes for several children.

Stakeholders commenting on this issue reported that DHS actively participates in The Adoption Exchange and that it is not uncommon for Colorado children to be adopted across State lines or for children from other States to be adopted by Colorado families. However, stakeholders in one county stated that because the local agency has been successful in promoting local adoptions with foster parents and relatives, the need for cross-jurisdictional resources is minimal.

XI. DETERMINATION OF SUBSTANTIAL CONFORMITY

For each outcome and systemic factor listed below, mark “Y” where the State is determined to be in substantial conformity and “N” where the State is determined not to be in substantial conformity. For each outcome or systemic factor marked “N,” place a check beside the performance indicator, listed by item number in this form, that has been determined to be an area needing improvement.

Outcomes

I. Safety

N Outcome S1

x Item 1
 Item 2

N Outcome S2

 Item 3
 Item 4

II. Permanency

N Outcome P1

x Item 5
x Item 6
x Item 7
 Item 8
x Item 9
x Item 10

N Outcome P2

 Item 11
 Item 12
x Item 13
x Item 14
 Item 15
x Item 16

III. Child and Family Well-Being

N Outcome WB1

x Item 17
x Item 18
x Item 19
x Item 20

Y Outcome WB2

 Item 21

N Outcome WB3

x Item 22
x Item 23

Systemic Factors

IV. Y Statewide Information System

 Item 24

V. N Case Review System

x Item 25
 Item 26
x Item 27
x Item 28
 Item 29

VI. Y Quality Assurance System

 Item 30
 Item 31

VII. Y Training

 Item 32
 Item 33
x Item 34

VIII. Y Service Array

 Item 35
 Item 36
 Item 37

IX. Y Agency Responsiveness to the Community

 Item 38
 Item 39
 Item 40

X. Y Foster and Adoptive Parent Licensing, Recruitment, and Retention

 Item 41
 Item 42
 Item 43
 Item 44
 Item 45